

EPA Registration
No. 83558-32
vol. 1

ROUTING AND TRANSMITTAL SLIP

6/27/08

TO: (Name, office symbol, room number, building, Agency/Post)		Initials	Date
1.	Gene		
2.			
3.	Re: 72167-55		
4.	72167-54		
5.			

<input checked="" type="checkbox"/> Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Per Dan, extend
conditional registrations
for 6 months.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Joanne Miller	Phone No.

5041-102

* U.S. GPO: 1990 — 262-080

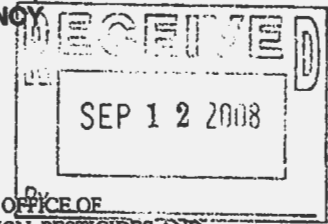
OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206



Epi Penn, Senay, Fw

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

10332



September 9, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JENNIFER YENTEL
MANA, INC, AGENT FOR
CELSIUS PROPERTY B.V., AMSTERDAM (NL)
NEUHAUSEN A.RHF BRANCH
4515 FALLS OF NEUSE RD., SUITE 300
RALEIGH, NC 27609

Dear Registrant:

Your request for a change in your Official EPA Company Name and Address record has been completed. For your confirmation the Official EPA Company Name and Address record for EPA Company Number: 83558 is listed below.

JENNIFER YENTEL
CELSIUS PROPERTY B.V., AMSTERDAM (NL)
NEUHAUSEN A.RHF BRANCH
RHEINWEG 7
SCHAFFHAUSEN
SWITZERLAND

Agent Address:

JENNIFER YENTEL
MANA, INC, AGENT FOR
CELSIUS PROPERTY B.V., AMSTERDAM (NL)
NEUHAUSEN A.RHF BRANCH
4515 FALLS OF NEUSE RD., SUITE 300
RALEIGH, NC 27609

Any future changes in company name and/or address or changes in designation/withdrawal of authorized agent should be directed to the following address. It can also be faxed to (703) 305-7670.

Document Processing Desk (COADR)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

If you have any questions, please call me at (703) 305-5411.

Sincerely,

M. Kathleen O'Malley

M. Kathleen O'Malley
Program Analyst
Office of Pesticide Programs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NOV 10 2010

Ann M. Tillman
t for Celsius Property B.V., Amsterdam (NL)
MANA, Inc
alls of Neuse Rd., Suite 300,
1, NC 27609

Tillman:

ie Agency is in receipt of the following Application for Pesticide Notification under
Registration Notice (PRN) 98-10:

CSF

No 83558-32
r Technical

Basic
Date 9/26/2008

istration Division (RD) has conducted a review of this request for its applicability under
-10 and finds that the action requested falls within the scope of PRN 98-10. The
ential Statement of Formula (CSF) submitted with the application is considered
table" and has been placed in our records.

If you have any questions, please contact me directly at 703-305-5335 or Banza Djapao
y staff at 703-305-7269.

Sincerely,

Paul Mastradone, Acting Leader
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

Recycled/Recyclable
Printed with Soy/Candela Ink on paper that
contains at least 50% recycled fiber



D# 141523 83558-32

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

for "Celsius Property, BV"

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

September 29, 2008

COURIER DELIVERY

Joanne Miller (PM23)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Celsius Property, BV, Amsterdam (NL)
Dithiopyr Technical, EPA Reg. No. 83558-32
Revised CSF and Label

Dear Ms. Miller,

On behalf of Celsius Property, BV Amsterdam (NL), please find a Confidential Statement of Formula (CSF) and label that have been revised to reflect the transfer of the registration from Nations Ag II LLC (formerly EPA Reg. No. 72167-55) to Celsius Property BV, Amsterdam (NL) for Dithiopyr Technical (EPA Reg. No. 83558-32). The transfer was approved August 28, 2008. Enclosed please find:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. Two copies of the Confidential Statement of Formula
3. Two copies of the revised label

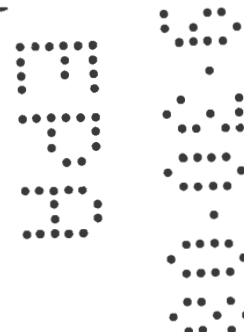
Please feel free to contact me by phone (253-853-7369) or by email (Ann@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures



MATERIAL TO BE ADDED TO JACKET

REG #

83558-32

Description:

Notification - PRN 98-10

check all that apply		Send to CSC
<input type="checkbox"/>	new stamped accepted label	
<input type="checkbox"/>	new CSF	
<input checked="" type="checkbox"/>	notification	

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's
Name:

BANZA DIAPAO

Date:

11-18-10

Phone:

305-17269

Division:

RA



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83558-32	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Celsius Property BV Amsterdam (NL)/Dithopyr Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) MANA, Inc. (agent for Celsius Property BV, Amsterdam (NL)) 4515 Falls of Neuse Road Raleigh, NC 27609 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION NOV 10 2010
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of label and CSF for transfer of ownership per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formule for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the requirements of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Pyxis Regulatory Consulting, Inc.	Title Agent	Telephone No. (Include Area Code) (252) 852-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Consultant	
4. Typed Name Ann M. Tillman	5. Date 9/24/08	

Dithiopyr Technical

ACTIVE INGREDIENT:

S, S'-dimethyl 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioate(*) 97.0%

OTHER INGREDIENTS 3.0%

TOTAL 100.0%

EPA Reg. No 83558-32

EPA Est. No: 81134-CHN-001

NOTIFICATION

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

NOV 10 2010

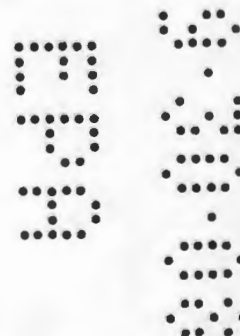
PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

In case of an emergency involving this product call: 1-800-308-5391

Net Weight: 55.1 Lbs (25 Kg)

Celsius Property, BV, Amsterdam (NL)
4515 Falls of Neuse Road
Raleigh, NC 27609



ENVIRONMENTAL HAZARDS

Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, ocean or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NDPES) permit and the permitting of authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or the Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use this product to formulate into end-use products in any type of equipment made of metal or metal ions (this restriction excludes stainless steel).

For manufacturing and formulation into herbicides only.

For use on established ornamental turf and lawn grasses (including golf course fairways, roughs, and tee boxes), sod farms, non-cropland and industrial sites, established landscape ornamentals, field and container ornamentals.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage, disposal, or cleaning of equipment.

Pesticide Storage: Store in original container.

Pesticide Disposal: Pesticide wastes are toxic. If these wastes cannot be disposed of by use of according to label instructions, they must be disposed of according to federal, state, and local procedures. Contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Triple rinse (or equivalent) the drum. Then, offer for recycling or reconditioning, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Seller warrants that this product conforms within its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. To the extent consistent with applicable laws, buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. To the extent consistent with applicable laws, in no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.

Dithiopyr Technical

ACTIVE INGREDIENT:

S, S'-dimethyl 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioate(*) 97.0%

OTHER INGREDIENTS 3.0%

TOTAL 100.0%

EPA Reg. No 83558-32

EPA Est. No: 81134-CH **NOTIFICATION**

NOV 10 2010

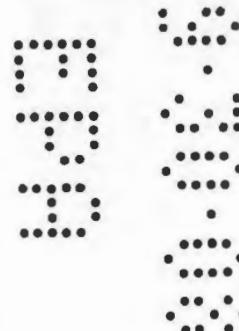
**KEEP OUT OF REACH OF CHILDREN
CAUTION**

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

In case of an emergency involving this product call: 1-800-308-5391

Net Weight: 55.1 Lbs (25 Kg)

Celsius Property, BV, Amsterdam (NL)
4515 Falls of Neuse Road
Raleigh, NC 27609



ENVIRONMENTAL HAZARDS

Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, ocean or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NDPES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or the Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use this product to formulate into end-use products in any type of equipment made of metal or metal ions (this restriction excludes stainless steel).

For manufacturing and formulation into herbicides only.

For use on established ornamental turf and lawn grasses (including golf course fairways, roughs, and tee boxes), sod farms, non-cropland and industrial sites, established landscape ornamentals, field and container ornamentals.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage, disposal, or cleaning or equipment.

Pesticide Storage: Store in original container.

Pesticide Disposal: Pesticide wastes are toxic. If these wastes cannot be disposed of by use of according to label instructions, they must be disposed of according to federal, state, and local procedures. Contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Triple rinse (or equivalent) the drum. Then, offer for recycling or reconditioning, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Seller warrants that this product conforms within its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. To the extent consistent with applicable laws, buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. To the extent consistent with applicable laws, in no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.

MATERIAL TO BE ADDED TO JACKET

REG #

83558-32

Description:

PB NOTICE 2007-4 Changes

check all that apply	
<input type="checkbox"/>	new stamped accepted label
<input type="checkbox"/>	new CSF
<input checked="" type="checkbox"/>	notification

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's

Name:

Steve Schaible

Date:

Phone:

703-308-9362

Division:

BD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

AUG 26 2009

Ms. Christie Hitchcock
Regulatory Specialist
Makhteshim Agan of North America, Inc.
4515 Falls of Neuse Road, Suite 300
Raleigh, NC 27609

Subject: Label Notification for Pesticide Registration Notice 2007-4
(**EPA Registration Number 83558-32**)

Dear Ms. Hitchcock,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated May 8, 2009 for the product Dithiopyr Technical (EPA Registration Number 83558-32). The Registration Division (RD) has conducted its review of this request for its applicability under PRN 2007-4 and finds that the label changes requested fall within the scope of PRN 2007-4. The label submitted with the application has been stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please call me directly at 703-305-6249 or Steve Schaible of my staff at 703-308-9362.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83558-32	2. EPA Product Manager Linda Arrington	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dithiopyr Technical	PM# 23 Registration Support Branch	
5. Name and Address of Applicant (Include ZIP Code) Celsius Property B.V., Amsterdam (NL) c/o Makhteshim Agan of North America, Inc. 4515 Falls of Neuse Rd., Suite 300, Raleigh, NC 27609 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: NOTIFICATION EPA Reg. No. _____ AUG 20 2009 Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance of PR Notice 2007-4 and requirements of EPA's regulations at 40 CFR §§156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statements to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must submitted				<input checked="" type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	<input checked="" type="checkbox"/> Glass	
				<input checked="" type="checkbox"/> Paper	
				Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 lbs or less; greater than 50 lbs		5. Location of Label Directions <input checked="" type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input checked="" type="checkbox"/> Other Self-adhesive		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Christie Hitchcock		Title Regulatory Specialist		Telephone No. (include Area Code) 919-256-9342	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Specialist			
4. Typed Name Christie Hitchcock		5. Date 05-08-09			



May 8, 2009

Document Processing Desk (NOTIF)
Registration Division (7504P)
OPP, USEPA
Ariel Rios Building
1200 Pennsylvania Ave, NW
Washington, DC 20460

Re: Dithiopyr Technical, EPA Reg. No. 83558-32
Notification per PRN 2007-4

To Whom It May Concern:

Makhteshim Agan of North America, Inc., as agent for Celsius Property, B.V., Amsterdam (NL), is notifying the Agency of a label update as allowed in PR Notice 2007-4. The change is summarized below:

- Updated container handling instructions per PRN 2007-4.

In support of this submission, the following documents are attached:

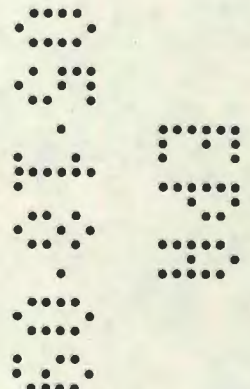
- Application for Pesticide Registration (EPA Form 8570-1)
- One copy of final printed labeling

Please contact me at 919-256-9342 or by email at chitchcock@manainc.com if you have any questions regarding this submission or would like a copy of the annotated label showing the changes for your files.

Sincerely,

Christie Hitchcock
Regulatory Specialist

Enclosures



AUG 20 2009

DITHIOPYR TECHNICAL

ACTIVE INGREDIENT:

S, S'-dimethyl 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioate* 97.0%

OTHER INGREDIENTS: 3.0%**TOTAL** 100.0%

*CAS No. 97886-45-8

KEEP OUT OF REACH OF CHILDREN CAUTION

Manufactured for:

Celsius Property B.V., Amsterdam (NL) Neuhausen a. Rhf Branch
c/o Makhteshim Agan of North America, Inc.
4515 Falls of Neuse Road, Suite 300
Raleigh, NC 27609

EPA Reg. No. 83558-32

EPA Est. No. [REDACTED]

NET CONTENTS: [REDACTED] lb. ([REDACTED] kg.)

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

In case of an emergency involving this product call: 1-800-308-5391

ENVIRONMENTAL HAZARDS

Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or the Regional Office of the U.S. EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use this product to formulate into end-use products in any type of equipment made of metal or metal ions (this restriction excludes stainless steel).

For manufacturing and formulation into herbicides only.

For use on established ornamental turf and lawn grasses (including golf course fairways, roughs, and tee boxes), sod farms, noncropland and industrial sites, established landscape ornamentals, field and container ornamentals.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store in original container.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. If these wastes cannot be disposed of by use or according to label instructions, they must be disposed of according to federal, state, and local procedures. Contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty container into formulation equipment. Then dispose of empty container in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer for recycling if available.

FOR 24-HOUR EMERGENCY ASSISTANCE (SPILL, LEAK, OR FIRE), CALL INFOTRAC AT 1-800-535-5053.

LIMITATION OF WARRANTY AND LIABILITY

Read the entire directions for use, conditions of warranties and limitations of liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following **CONDITIONS, DISCLAIMER OF WARRANTIES and LIMITATIONS OF LIABILITY.**

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Celsius Property B.V., Amsterdam (NL) Neuhausen a. Rhf Branch. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Celsius Property B.V., Amsterdam (NL) Neuhausen a. Rhf Branch makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Celsius Property B.V., Amsterdam (NL) Neuhausen a. Rhf Branch is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Celsius Property B.V., Amsterdam (NL) Neuhausen a. Rhf Branch disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Celsius Property B.V., Amsterdam (NL) Neuhausen a. Rhf Branch's election, the replacement of product.

Dithiopyr Technical (83558-32)(notif to EPA 05-08-09)

NOTIFICATION
AUG 20 2009



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

OCT 19 2009

Ms. Ann M. Tillman
Consultant
Celsius Property B.V., Amsterdam (NL); (Neuhasen A RHF Branch)
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

SUBJECT: Dithiopyr Technical
EPA Registration No. 83558-32
Application Dated: October 7, 2008 and Letter Dated
September 26, 2008; Request To Amend Registration To
Comply with Notice of Pesticide Registration, Dated
October 11, 2007; Submission of Storage Stability and
Corrosion Data, Assigned EPA MRID No 475526-01

Your application to amend the registration of "Dithiopyr Technical" by complying with the requirement for the submission of Storage and Corrosion Data has been reviewed and found acceptable under the Federal Insecticide, Fungicide and Rodenticide Act. A copy of the review, dated October 14, 2009, of the data identified by EPA MRID No. 476582-01 is enclosed for your records.

Sincerely yours,

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

Enclosure

DATE OUT: March 11, 2009

SUBJECT: STORAGE STABILITY (830.6317) & CORROSION CHARACTERISTICS
(830.6320) REVIEW
ACCELERATED STUDY ☐; ONE YEAR STUDY ☒;
OVER 1 YEAR STUDY ☐
MP ☒ EP ☐ EUP ☐ ACTION CODE 570
DP BARCODE No.: 357108 REG. No.: 83558-32
DECISION No.: 401039 MRID No(s): 475526-01
PRODUCT NAME: DITHIOPYR TECHNICAL
COMPANY: Celsius Property, B.V., AMSTERDAM (NL)

FROM: William Herald / Reviewer *W Herald*
Product Chemistry Team
Technical Review Branch/RD (7505P)

Sbm 10/14/09

TO: Eugene Wilson / Joanne Miller, RM 23
Herbicide Branch / RD (7505P)

I. CONCLUSIONS:

STORAGE STABILITY (830.6317):

☒ ACCEPTABLE
☐ UNACCEPTABLE*
☐ UPGRADEABLE*

40CFR158.310 DATA REQUIREMENT: ☒ SATISFIED ☐ NOT SATISFIED

CORROSION CHARACTERISTICS (830.6320):

☒ ACCEPTABLE
☐ UNACCEPTABLE*
☐ UPGRADEABLE*

40CFR158.310 DATA REQUIREMENT: ☒ SATISFIED ☐ NOT SATISFIED

* If unacceptable or upgradeable describe the deficiency and provide recommendations

Comments & Recommendations:

II. STUDY SUMMARY

A. STUDY CONDUCTED UNDER US GLP/OECD GUIDELINES

☒ Yes
☐ No

B. PRODUCT INFORMATION

Active ingredient(s): Dithiopyr
Label claim(s) Nominal concentration(s) (%): 97.0%
Initial concentration(s) of the AI(s) (%) used in the study: 98.5
Lower certified limits (%) based on AI % in the study: 95.545%

C. EXPERIMENTAL PARAMETERS

Temperature: Ambient laboratory temperatures ranging between 18°C and 24°C.
Duration of study: 1 year.
Type of container: Low-density-polypropylene LDPE) bags (provided by the sponsor.
Analysis at intervals: ☒ 0 (initial); ☒ 3 months; ☒ 6 months; ☒ 9 months; ☒ 12 months.

D. ANALYTICAL METHOD

Method	DETECTOR
High Pressure Liquid chromatography (HPLC)	UV/VIS (275nm)

E. RESULTS

1. Compared to the initial concentration of 98.5%, the reported data shows that on the 3rd, 6th, 9th and 12th month testing intervals, the AI% remained within the statutory parameters required in Title 40 CFR § 158.350 while stored at ambient laboratory temperatures ranging between 18°C and 24°C.
2. The test substance was observed to be a brown-gray powder initially and throughout the study period, showing no signs of clumping, phase separation, or discoloration. During the storage period the containers showed no signs of cracking, fogging, discoloration, or distortion of the bag.
3. The mean total weight change of the test containers was 0.0%.
4. The analytical methods were evaluated for precision, linearity and accuracy.

MATERIAL TO BE ADDED TO JACKET

4/6/6/3

REG #

83558-32

Description:

Applications for Pesticide

Notification - Add Logo. Additional

CONTAINER Size, and Additional Emergency #	
check all that apply	
<input type="checkbox"/>	new stamped accepted label
<input type="checkbox"/>	new CSF
<input checked="" type="checkbox"/>	notification

Send to CSC

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's

Name:

Leeri Stans

Date:

Phone:

703-305-1617

Division:

RD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAR 9 2009

Jane Rothwell
Agent for Celsius Property,
BV (Neuhasen A RHF Branch)
C/o Makhteshim Agan of North America, Inc.
4515 Falls of Neuse Road, Suite 300
Raleigh, NC 27609

SUBJECT: Applications for Pesticide Notification per PR Notice 98-10
Nations Ag II Thidiazuron Technical EPA Reg. No. 83558-25
- Updated Warranty, Change of Ownership EPA No.,
and Primary Name Change to "Thidiazuron Technical"
Application Dated October 27, 2008
Trinexapac-Ethyl Technical EPA Reg. No. 83558-31
Dithiopyr Technical EPA Reg. No. 83558-32
- Updated Warranty and Change of Ownership EPA No.
Applications Dated October 20, 2008

Dear Ms. Rothwell:

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above products. The Registration Division (RD) has conducted a review of these requests for their applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The labels submitted with the applications have been date-stamped "Notification" and will be placed in our records.

If you have any questions, please contact me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83558-32	2. EPA Product Manager Linda Arrington	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dithiopyr Technical	PM# 23 Registration Support Branch	
5. Name and Address of Applicant (Include ZIP Code) MANA, Inc. c/o Celsius Property, BV (Neuhasen A RHF Branch), 4515 Falls of Neuse Rd., Suite 300 Raleigh, NC 27609 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

NOTIFICATION
MAR 9 2009

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

NOTIFICATION OF: UPDATED WARRANTY STATEMENT. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Metal Plastic Glass Paper Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Jane Rothwell		Title Registration Specialist		Telephone No. (Include Area Code) 901-861-4400	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					
2. Signature 		3. Title Registration Specialist		6. Date Application Received (Stamped)	
4. Typed Name Jane Rothwell		5. Date 10-20-08			



MANA

October 20, 2008

Document Processing Desk (NOTIF)
Registration Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave, NW
Washington DC 20460

Re: Notification of updated Warranty Statement
Dithiopyr Technical: EPA Reg. No. 83558-32

To Whom It May Concern:

Makhteshim Agan of North America, Inc. as agent for Celsius Property, BV (Neuhasen A RHF Branch) is notifying the Agency that the Warranty Statement has been updated in accordance with EPA's guidance document dated 10-17-06 (allowed per PRN 98-10 §II (J)).

Enclosed with this application are the following documents:

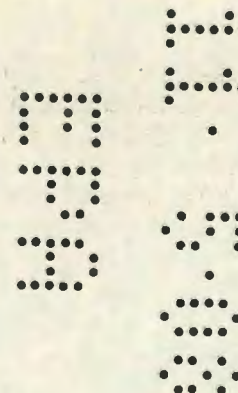
- Application for Registration (EPA Form 8570-1)
- One copy of final printed labeling

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

Please contact me at 901-861-4400 or by email at janer@manainc.com should you have any questions.

Sincerely,

Jane Rothwell
Enclosures



NOTIFICATION
MAR 9 2009

DITHIOPYR TECHNICAL

11 5 08
EPA

ACTIVE INGREDIENT:

S, S'-dimethyl 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioate*97.0%

OTHER INGREDIENTS:3.0%

TOTAL:100.0%

* CAS No. 97886-45-8

EPA Reg. No. 83558-32

EPA Est. No. 022000-001

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

In case of an emergency involving this product call: 1-800-308-5391

ENVIRONMENTAL HAZARDS

Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or the Regional Office of the U.S. EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use this product to formulate into end-use products in any type of equipment made of metal or metal ions (this restriction excludes stainless steel).

For manufacturing and formulation into herbicides only.

For use on established ornamental turf and lawn grasses (including golf course fairways, roughs, and tee boxes), sod farms, non-cropland and industrial sites, established landscape ornamentals, field and container ornamentals.

CELSIUS PROPERTY, BV
(NEUHASEN A RHF BRANCH)
4515 FALLS OF NEUSE RD, SUITE 300
RALEIGH, NC 27609

Net Weight: 55.1 Lbs (25 Kg)

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage, disposal, or cleaning of equipment.

Pesticide Storage: Store in original container.

Pesticide Disposal: Pesticide wastes are toxic. If these wastes cannot be disposed of by use or according to label instructions, they must be disposed of according to federal, state, and local procedures. Contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Triple rinse (or equivalent) the drum; then offer for recycling or reconditioning or puncture and dispose in a sanitary landfill or by other procedures approved by state and local authorities.

LIMITATION OF WARRANTY AND LIABILITY

Read the entire directions for use, conditions of warranties and limitations of liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following **CONDITIONS, DISCLAIMER OF WARRANTIES, and LIMITATIONS OF LIABILITY.**

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Celsius Property, BV. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Celsius Property, BV makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Celsius Property, BV is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Celsius Property, BV disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Celsius Property, BV's election, the replacement of product.

625-0-05

EPA 062907/Trans 082808/Rev A

DITHIOPYR TECHNICAL



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DEC 31 2008

Mrs. Ann M. Tillman
Consultant
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Subject: Notifications for Label Revisions under PRN 98-10 to revise Limitations of
Warranty and Liability and PRN 2007-4

Dear Ms. Tillman:

The Agency is in receipt of your Application(s) for Pesticide Notification under
Pesticide Registration Notices (PRN) 98-10 and 2007-4 dated October 29, 2008 for:

EPA Registration 83558-32 Dithiopyr Technical



The Registration Division (RD) has conducted a review of the requests for applicability
under PRN 98-10 and PRN 2007-4 and finds that the label changes requested fall within the scope of
PRN-98-10 and PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our
records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or
other code identify the batch of the pesticide distributed and sold be placed on nonrefillable containers.
The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or
durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Joyce Edwards of my
staff at 703-308-8893.

Sincerely,

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

 United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 83558-32		2. EPA Product Manager J. Miller	
4. Company/Product (Name) Celsius Property BV Amsterdam (NL)/Dithopyr Technical		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) MANA, Inc. (agent for Celsius Property BV, Amsterdam (NL)) 4515 Falls of Neuse Road Raleigh, NC 27609 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section - II			
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Other - Explain below.	
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Submission of final report on storage stability and corrosion characteristics.			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Pyxis Regulatory Consulting, Inc.		Title Consultant	
		Telephone No. (Include Area Code) (253) 853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			5. Date Application Received (Stamped)
2. Signature 		3. Title Consultant	
4. Typed Name Ann M. Tillman		5. Date 10/7/08	



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

Registration
Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83558-32	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Celsius Property BV, Amsterdam (NL)/Dithiopyr Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) MANA, Inc. (agent for Celsius Property BV, Amsterdam (NL)) 4515 Falls of Neuse Rd., Suite 300 Raleigh, NC 27609 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated 6-29-07
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of final report on storage stability and corrosion characteristics.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Pyxis Regulatory Consulting, Inc.	Title Agent	Telephone No. (Include Area Code) 901-861-4400 233-853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		9. Date Application Received (Stamped)
2. Signature Ann M. Tillman X	3. Title Consultant X Should be signed by Agent.	
4. Typed Name Ann M. Tillman X	5. Date 9/24/08	



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83558-32	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Celsius Property BV, Amsterdam (NL)/Dithiopyr Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) MANA, Inc. (agent for Celsius Property BV, Amsterdam (NL)) 4515 Falls of Neuse Rd., Suite 300 Raleigh, NC 27609 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated 6-29-07
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of final report on storage stability and corrosion characteristics.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Pyxis Regulatory Consulting, Inc.	Title Agent	Telephone No. (Include Area Code) 901-861-4400
2. Signature 		3. Date Application Received (Stamped)
3. Title Consultant		
4. Typed Name Ann M. Tillman		
5. Date 9/24/08		

PYXIS REGULATORY CONSULTING, INC.

475528-00

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

September 26, 2008

COURIER DELIVERY

Joanne Miller (PM23)
Document Processing Desk
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Celsius Property, BV, Amsterdam (NL)
Dithiopyr Technical, EPA Reg. No. 83558-32
Storage Stability and Corrosion Characteristics Study per the Agency Letter Dated June 29, 2007

Dear Ms. Miller,

On behalf of Celsius Property, BV and in response to the Agency letter dated June 29, 2007, please find enclosed the final report for the storage stability and corrosion characteristics study for Dithiopyr Technical (EPA Reg. No. 83558-32).

The following documents are enclosed:

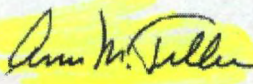
1. Application for Pesticide Registration (EPA Form 8570-1)
2. Product Specific Data (3 copies).

47552801

Volume 1	830.6317, 830.6320	Wo, C. Dithiopyr Technical. Storage Stability and Corrosion Characteristics.
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Please feel free to contact me by phone (253-853-7369) or by email (Ann@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,


Ann M. Tillman

Enclosures

PYXIS REGULATORY CONSULTING, INC.

475526-00

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

September 26, 2008

COURIER DELIVERY

Joanne Miller (PM23)
Document Processing Desk
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Celsius Property, BV, Amsterdam (NL)
Dithiopyr Technical, EPA Reg. No. 83558-32
Storage Stability and Corrosion Characteristics Study per the Agency Letter Dated June 29, 2007

Dear Ms. Miller,

On behalf of Celsius Property, BV and in response to the Agency letter dated June 29, 2007, please find enclosed the final report for the storage stability and corrosion characteristics study for Dithiopyr Technical (EPA Reg. No. 83558-32).

The following documents are enclosed:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. Product Specific Data (3 copies).

47552601

Volume 1	830.6317, 830.6320	Wo, C. Dithiopyr Technical. Storage Stability and Corrosion Characteristics.
----------	-----------------------	--

Please feel free to contact me by phone (253-853-7369) or by email (Ann@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures

PYXIS REGULATORY CONSULTING, INC.

475528-00

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

September 26, 2008

COURIER DELIVERY

Joanne Miller (PM23)
Document Processing Desk
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Celsius Property, BV, Amsterdam (NL)
Dithiopyr Technical, EPA Reg. No. 83558-32
Storage Stability and Corrosion Characteristics Study per the Agency Letter Dated June 29, 2007

Dear Ms. Miller,

On behalf of Celsius Property, BV and in response to the Agency letter dated June 29, 2007, please find enclosed the final report for the storage stability and corrosion characteristics study for Dithiopyr Technical (EPA Reg. No. 83558-32).

The following documents are enclosed:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. Product Specific Data (3 copies).

47552801

Volume 1	830.6317, 830.6320	Wo, C. Dithiopyr Technical. Storage Stability and Corrosion Characteristics.
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Please feel free to contact me by phone (253-853-7369) or by email (Ann@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 1, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

CELSIUS PROPERTY B.V., AMSTERDAM (NL)
NEUHAUSEN A.RHF BRANCH
4515 FALLS OF NEUSE RD., SUITE 300
RALEIGH, NC 27609-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 29-SEP-08. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Eugene Wilson
703-305-6103



LOA_pyxis.pdf



Celsius Property BV
Neuhausen a.Rhf Branch

Unacceptable 09-05-08
There can be only one Agent for this Foreign Registrant.
S. Wilson

Document Processing Desk (7504P)
U. S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

10.July 2006

To whom it may concern:

The purpose of this letter is to inform you that Ms. Anne Stout and Ms. Jane Rothwell are regulatory consultants employed by Celsius Property, BV (Neuhausen a Rhf Branch) (Celsius) and will be filing application(s) for FIFRA registration(s) on our behalf. Additionally, all Makhteshim Agan of North America, Inc. (MANA) employees (including but not limited to Kris Venkatesh, Leanne Pruett, Robert Everich, Ephi Gur, Christie Hitchcock, Jennifer Yentel) are authorized to act as agents on behalf of Celsius and may submit application(s) for FIFRA registration(s).

Ms. Stout and Ms. Rothwell can be reached at the following address:
362 New Byhalla, Suite 1
Collierville, TN. 38017
Telephone number: (901) 861-4400
Fax number: (901) 861-4492

MANA employees can be reached at the following address:
4515 Falls of Neuse Road, Suite 300
Raleigh, NC 27609
Telephone number: (919) 256-9300
Fax number: (919) 256-9308

Should you have any other questions or comments, please do not hesitate to contact me.

Sincerely,
Celsius Property, BV (Neuhausen a Rhf Branch)

Nissim Kornforty
Nissim Kornforty
Managing Director

Celsius Property B.V. Amsterdam, (NL), Neuhausen a Rhf Branch
Rheinweg 7, 8200 Schaffhausen, Switzerland
Tel: +41 (0) 52 634 08 08, Fax +41 (0) 52 634 08 0
Member of the Makhteshim Agan Group



Kris Venkatesh
<kvenkatesh@manainc.com>

09/09/2008 10:45 AM

To Eugene Wilson/DC/USEPA/US@EPA, Joanne
Miller/DC/USEPA/US@EPA, Dan
Kenny/DC/USEPA/US@EPA
cc Ann Tillman <Ann@PyxisRC.com>, Annie Stout
<annies@manainc.com>, Janelle Kay
<Janelle@PyxisRC.com>

bcc

Subject RE: Transfer of 72167-54 and 55 to 83558-31 and -32, resp.

To Mr. Wilson/Ms. Muller/Mr. Dan Kenney:

Please find the enclosed authorization letter we had sent to EPA indicating that representatives of MANA Raleigh, NC and Pyxis Regulatory consultants are the agents for Celcius. You can correspond with the person who submitted the package on behalf of Celcius who can clarify any issues you may have.

Kris Venkatesh, Ph.D.
MANA Regulatory Affairs
Raleigh, NC
919-256-9329

-----Original Message-----

From: Ann Tillman [mailto:Ann@PyxisRC.com]
Sent: Tuesday, September 09, 2008 9:32 AM
To: Kris Venkatesh
Subject: FW: Transfer of 72167-54 and 55 to 83558-31 and -32, resp.

Ann

-----Original Message-----

From: Wilson.Eugene@epamail.epa.gov
[mailto:
Subject: Transfer of 72167-54 and 55 to 83558-31 and -32, resp.

Ann:

We have no functional telephone Number for Celsius Property, BV. The one we have does not work (we have Nissim Konforty, as their contact person; and phone number: 415-263-40808. We need to discuss pending: 83558-RE. Application form and the matter of name of Registrant and address of Registrant In this regard, please note Chapter 15 of the EPA Label Review Manual (August, 2003). If Celsius has a North Carolina address, it should be used. Otherwise use Pyxis' address.

In the transfer of products to Celsius, a Raleigh, NC address was used. We prefer to use the registrant's US address if there is one, as is the case here. We need to discuss this matter as the PRIA Date is Nov. 1, 2008.

Regards



Louis Vaughn/DC/USEPA/US
09/05/2008 05:25 PM

To Eugene Wilson/DC/USEPA/US@EPA
cc
bcc
Subject Re: Transfer 72167-55 to 83558-32

OPPIN query shows Ephi Gur at:

Agent Name: MANA INC.
Agent Contact: MR. EPHI GUR
Agent Phone: (919) 256-9300
Official Address: 4515 FALLS OF NEUSE RD., SUITE 300
RALEIGH, North Carolina 27609
UNITED STATES

Louis Vaughn
Information Management Specialist
Contracting Officer's Representative (COR)
Document and Data Management Support Contract
U. S. Environmental Protection Agency
Office of Pesticide Programs - ITRMD
PH: (703) 308-8114
Eugene Wilson/DC/USEPA/US

Eugene
Wilson/DC/USEPA/US
09/05/2008 08:17 AM

To Louis Vaughn/DC/USEPA/US@EPA
cc
Subject Re: Transfer 72167-55 to 83558-32

Louis:

Thank you for the transfer letter.
Do you have the correspondence on
this requested transfer. I am trying to
find the telephone number for Mr. Gur.
of Celsius. (My phone No. 305-6103
may be helpful).

Regards.

Louis Vaughn/DC/USEPA/US



Louis Vaughn/DC/USEPA/US
09/04/2008 05:37 PM

To Eugene Wilson/DC/USEPA/US@EPA
cc Ollie Young/DC/USEPA/US@EPA
Subject Transfer 72167-55 to 83558-32

Mr. Wilson,

The file room is given a copy of all transfers so that they can insert a copy of the transfer into the jacket as well as change the product number on the jacket.

This was a very recent transfer (last Thursday). They may not have gotten to it yet. That is probably why you did not find it in the jacket.



L_72167_RAD_83558_8_28_2008.pdf

Louis Vaughn
Information Management Specialist
Contracting Officer's Representative (COR)
Document and Data Management Support Contract
U. S. Environmental Protection Agency
Office of Pesticide Programs - ITRMD
PH: (703) 308-8114



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 28, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MR. EPHI GUR
MANA, INC, AGENT FOR
CELSIUS PROPERTY, BV (NEUHASEN A RHF BRANCH)
4515 FALLS OF NEUSE RD., SUITE 300
RALEIGH, NC 27609

Dear Mr. Gur:

Subject: Transfer of Pesticide Registrations and Data From Company Number 72167 to
Company Number 83558

Pursuant to your request in your letter and transfer agreement received February 4, 2008
and subsequent information received on August 27, 2008, we have approved the transfer of the
following registrations from **NATIONS AG II, LLC**, company number **72167** to **CELSIUS
PROPERTY, BV (NEUHASEN A RHF BRANCH)**, company number **83558**.

The effective date of these changes is the date of this letter.

<u>Registered Products</u>	<u>Old EPA Reg. No.</u>	<u>New EPA Reg. No.</u>
TRINEXAPAC-ETHYL TECHNICAL	72167-54	83558-31
DITHIOPYR TECHNICAL	72167-55	83558-32

You should indicate the new company designation, new EPA Registration Number and
new Establishment Number (if it has changed) on the labeling at the next printing which should
occur no later than 18 months after the effective date of this transfer. After 18 months, any
product released for shipment must bear the new Registration Number and Establishment
Number. If you intend to use the labels which currently appear on the transferor's product after
the effective date of the transfer, but within the 18 month grace period, you must maintain
complete and accurate records which identify by batch number, lot number, or other suitable
description the quantities of such product bearing the transferor's label. Each container or
package bearing the transferor's label which is released after the effective date of product
registration transfer, must be clearly and accurately marked with the batch number, lot number or
other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the
Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental

distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

Shipment under this product's new registration Number.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to initiation. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

This language need to be corrected

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

*E. Wilson
09-05-08.*

In regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

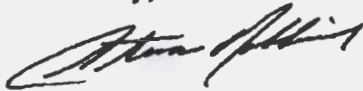
The Agency acknowledges that it has received a request for data transfer received February 4, 2008 and subsequent information received on August 27, 2008 to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **CELSIUS PROPERTY, BV (NEUHASSEN A RHF BRANCH)** will be considered the data owner. This action will not automatically reflect on the Data Submitters List.

If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Louis Vaughn at (703) 308-8114.

Sincerely,



Steve Robbins, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: MR. EPHI GUR
MANA INC., AGENT FOR
NATIONS AG II, LLC
4515 FALLS OF NEUSE RD., SUITE 300
RALEIGH, NC 27609

72167_RAD_83558_8_28_08



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 27 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Janelle Kay
Agent
Nations Ag II, LLC
Pyxis Regulatory Consulting, Inc
4110 136th St. NW
Gig Harbor, WA 98332

Dear Ms. Kay:

SUBJECT: Dithiopyr Technical
EPA Registration No.72167-55
Application and Letter Dated June 24, 2008, Request
To Amend Registration of Dithiopyr Technical To
Remove "Time Limitation for Registration"

The subject application to amend the registration of "Dithiopyr Technical" by removal of time limitation for registration as described in this Agency's "Notice of Pesticide Registration dated June 29, 2007 has been re-reviewed. As the conditions Number 2 and 3 stated in the Notice of Registration have been resolved by the enclosed EPA Review Memorandum dated August 7, 2008, the time-line for responding to those comments is no longer an issue with the subject pesticide product registration. The registration will continue under the other conditions in the "Notice of Registration" dated June 29, 2007.

Sincerely yours,

A handwritten signature in blue ink that reads "Joanne I. Miller".

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

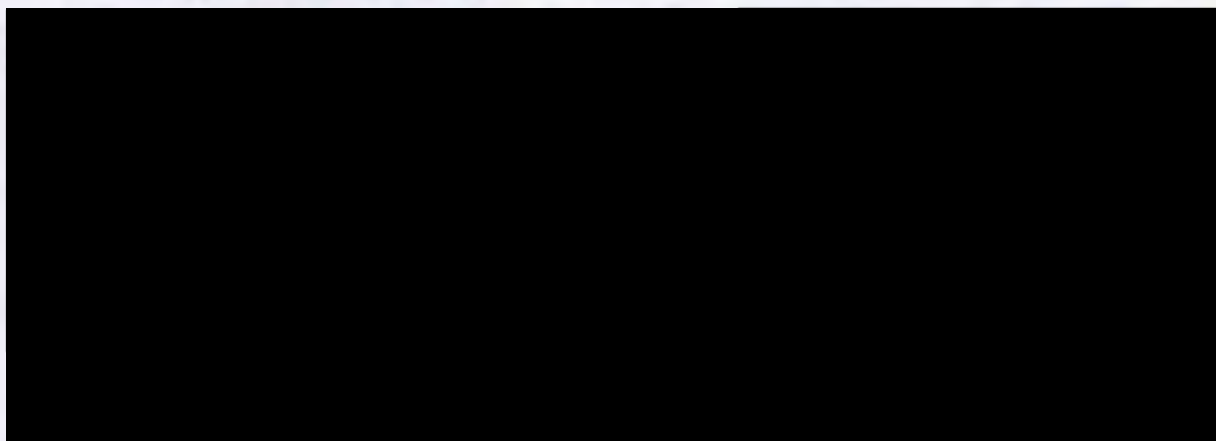
Enclosure

Memorandum

To: Dan Kenny, Chief
From: Christine Olinger, Co-Chair
Mary Manibusan, Co-Chair *MM*
Date: August 7, 2008
RE: Dithiopyr

Dithiopyr has been classified as a Group E carcinogen with no evidence for carcinogenicity in humans. There are no impurities of risk concern based on the evaluation of its hazard using expert judgement and predictions provided by Derek for Windows and consideration of the exposure levels (0.1-0.25%).

The impurities evaluated included:



Across this structural group, the only chemical alert was for skin sensitization attributed to the thioester portion of these compounds. These are likely to induce skin sensitization as a result of hydrolysis to the corresponding thiol, which may then undergo thiol exchange with disulphide bridges present in skin proteins.

While the presence of a skin sensitization structural alert within a molecule indicates the molecule has the potential to cause skin sensitization, whether the molecule will actually be a skin sensitizer will depend on its percutaneous absorption. Generally small lipophilic molecules are more readily absorbed into the skin and therefore more likely to cause sensitization. In this case, these compounds are fairly large and are not expected to be readily absorbed into the skin.

Manufacturing process information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

30 JUN 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Janelle Kay
Agent
Nations Ag II, LLC
Pyxis Regulatory Consulting, Inc
4110 136th St. NW
Gig Harbor, WA 98332

Dear Ms. Kay:

SUBJECT: Dithiopyr Technical
EPA Registration No.72167-55
Application and Letter Dated June 24, 2008, Request
To Amend Registration of Dithiopyr Technical To
Remove "Time Limitation for Registration"

The subject application to amend the registration of "Dithiopyr Technical" by removal of time limitation for registration as described in this Agency's "Notice of Pesticide Registration dated June 29, 2007 has been reviewed. As the conditions Number 2 and 3 stated in the Notice of Registration are yet pending review by this Agency, the registration of this pesticide product is extended to January 1, 2009 under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, provided that you:

- o Submit to this Agency information and or data that justify a finding that this product is similar to the product that is identified as identical or similar in composition to the one identified on the "Application for Pesticide Registration" received on November 3, 2006. Notwithstanding the "Reverse Mutation Assay using Bacteria" (Salmonella typhimurium and Escherichia coli) with Dithiopyr Technical" (EPA MRID No. 471475-01) in your letter dated June 4, 2007, signed by Ann M. Tillman, additional data will likely be required to support this registration.

This registration will expire, without hearing rights on January 1, 2009 unless the Agency receives an amendment to

-2-

remove the time limitation. To prevent it from expiring your response to this letter should be made within 30 days from the date of this letter.

Sincerely yours,

Joanne I. Miller

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

June 24, 2008

COURIER DELIVERY

Joanne Miller (PM23)
Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Nations Ag II, LLC – Dithiopyr Technical (EPA Reg. No. 72167-55)
Amendment to Remove Time Limitation of Registration

Dear Ms. Miller,

Nations Ag II LLC's Dithiopyr Technical was conditionally registered on June 29, 2007. As stated in your letter, several points were to be addressed:

1. **Label Changes:** All of the changes required to the product labeling have been completed and final labels submitted on August 28, 2007.
2. **Storage Stability and Corrosion Characteristics Data:** These studies are underway and in a letter dated December 11, 2007, Nations Ag II requested an extension for submission of the final report to November 1, 2008. To date, we have not received a response to this extension request.
3. **Amendment to Remove Time Limitation:** This letter requests that the Agency remove the time limitation for registration of this product. According to your letter, the Agency was going to evaluate the database for this product and, if necessary, was to notify Nations Ag II if there were additional data requirements required for continued registration of this product. To date, Nations Ag II has not received any information from the Agency regarding new data requirements. Therefore, Nations Ag II respectfully requests removal of the time limitation for Dithiopyr Technical.

In support of this amendment, we submit the following documents:

1. Application for a New Pesticide Registration (EPA Form 8570-1)
2. Letter of Authorization

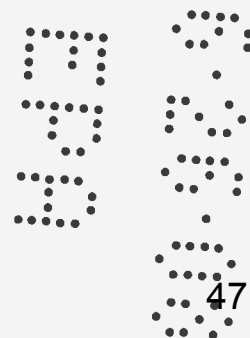
Please feel free to contact me by phone (253-853-7369) if you have any questions or need any additional information.

Sincerely,


Janelle Kay

Enclosures

cc: Daniel Kenny, Herbicide Division Branch Chief





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72167-55	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Nations Ag II, LLC / Dithiopyr Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Nations Ag II, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Amendment to remove time limitation for registration.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Ann M. Tillman		Title Agent		Telephone No. (Include Area Code) (253) 853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name Janelle Kay		5. Date 6/24/94			

Material to be added to a Mini-Jacket
(in the case where an e-Jacket exists)

Reg. No. 72167-55

Send to SIG: check box ☐

This material is:

- ☐ New stamped-accepted label
- ☐ New CSF
- ☐ Notification
- ☐ Final Printed Label

☒ Other:

Add to file

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: E. J. Kraft

Phone: 308-9 358 Division: RD

Date: 12-11-07

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

December 11, 2007

COURIER DELIVERY

Joanne Miller/Kathryn Montague (PM23)
Document Processing Desk
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Nations Ag II LLC – Dithiopyr Technical (EPA Reg. No. 72167-55)
Request for Extension for Storage Stability and Corrosion Characteristics Study

Dear Ms. Miller and MS. Montague,

As a condition of registration, Nations Ag II LLC initiated a storage stability and corrosion characteristics study with Dithiopyr Technical. However, the study initiated September 26, 2007 (see attached documentation in the form of an email dated December 4, 2007) which means a final report will not be available by June 29, 2008, the date by when the report was to be submitted as specified in the Agency letter dated June 29, 2007. ***Nations Ag II LLC respectfully requests an extension for submission of the final report for storage stability and corrosion characteristics data.***

With the final sampling point due September 26, 2008, a final report should be available for submission by November 1, 2008. ***Please let me know if this extension is acceptable or if you wish to receive an interim storage stability report in June 2008, the original timing specified in the June 29, 2007 letter.***

Please feel free to contact me by phone (253-853-7369) or by email (Ann@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosure

Wilson

MATERIAL TO BE ADDED TO JACKET

REG #

72167-55

Description:

Final printed label

if applicable, check all that are attached

☐ new stamped accepted label

☐ new CSF

☐ notification

Send to CSC

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's

Name:

J. Miller

Date:

9-7-07

Phone:

305-6224

Division:

RD

EPA

09-04-07

Nations Ag II

DITHIOPYR TECHNICAL

ACTIVE INGREDIENT:

S, S'-dimethyl 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioate97.0%

OTHER INGREDIENTS: 3.0%**TOTAL:**100.0%

EPA Reg. No. 72167-55

EPA Est. No. 81134-CHN-001

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

In case of an emergency involving this product call: 1-800-308-5391

ENVIRONMENTAL HAZARDS

Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, ocean or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NDPES) permit and the permitting of authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or the Regional Office of the U.S. EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not use this product to formulate into end-use products in any type of equipment made of metal or metal ions (this restriction excludes stainless steel).

For manufacturing and formulation into herbicides only.

For use on established ornamental turf and lawn grasses (including golf course fairways, roughs, and tee boxes), sod farms, non-cropland and industrial sites, established landscape ornamentals, field and container ornamentals.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage, disposal, or cleaning or equipment.

Pesticide Storage: Store in original container.

Pesticide Disposal: Pesticide wastes are toxic. If these wastes cannot be disposed of by use of according to label instructions, they must be disposed of according to federal, state, and local procedures. Contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Triple rinse (or equivalent) the drum. Then, offer for recycling or reconditioning, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Seller warrants that this product conforms within its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. To the extent consistent with applicable law, buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.

Nations Ag II, LLC
4515 Falls of Neuse Road • Raleigh, NC 27609

Net Weight: 55.1 Lbs (25 Kg)

625-0-06

EPA 062907

DITHIOPYR TECHNICAL



**Makhteshim Agan of
North America, Inc.**

August 28, 2007

HB

Document Processing Desk (FPL)
Registration Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave, NW
Washington DC 20460

Attn: Mr. Eugene Wilson

Re: Submission of final printed labeling per EPA letter dated 6-29-07
Dithiopyr Technical: EPA Reg. No. 72167-55

Note: This submission supercedes our submission dated July 13, 2007

Dear Mr. Wilson:

Makhteshim Agan of North America, Inc., as the agent for Nations Ag II, LLC, is submitting corrected final printed labeling in response to your letter dated 6-29-07. Please note that our original submission on July 13, 2007 contained an error in the chemical name on the label.

Enclosed with this application are the following documents:

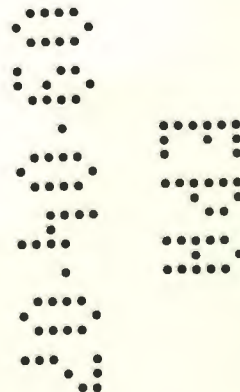
- Application for Registration (EPA Form 8570-1)
- One copy of final printed labeling
- Copy of e mail to Mr. E. Wilson dated August 28, 2007

Please contact Anne Stout as 901-861-4400 or by email at annies@manainc.com should you have any questions.

Sincerely,

Anne Stout
Registration Specialist

Enclosures





United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72167-55	2. EPA Product Manager Dan Kenny	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dithiopyr Technical	PM# Herbicide Branch	
5. Name and Address of Applicant (Include ZIP Code) Makhteshim Agan of North America, Inc., as agent for Nations Ag II, LLC, 4515 Falls of Neuse Rd., Suite 300 Raleigh, NC 27609 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

☐ Amendment - Explain below.

☐ Resubmission in response to Agency letter dated _____

☐ Notification - Explain below.

☐ Final printed labels in response to Agency letter dated 6-29-07

☐ "Me Too" Application.

☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

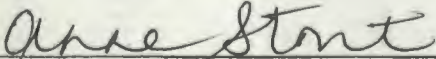
Submission of final printed labeling in response to EPA letter 6-29-07.

NOTE: This supercedes our submission dated 7-13-07.

Section - III

1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No
2. Certification must submitted		If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt No. per container
2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____				
3. Location of Net Contents Information		4. Size(s) Retail Container		5. Location of Label Directions
<input type="checkbox"/> Label <input type="checkbox"/> Container				<input type="checkbox"/>
6. Manner in Which Label is Affixed to Product				
<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				
<input type="checkbox"/> Other _____				

Section - IV

1. Contact Point <i>(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)</i>		
Name Anne Stout	Title Registration Specialist	Telephone No. <i>(Include Area Code)</i> 901-861-4400
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title Registration Specialist	
4. Typed Name Anne Stout	5. Date 8-28-07	

Annie Stout

From: Annie Stout
Sent: Tuesday, August 28, 2007 1:04 PM
To: 'Wilson.Eugene@epamail.epa.gov'
Subject: RE: Dithiopyr Technical, EPA Reg. No. 72167-55



NA II Dithiopyr
Tech Approved ...

Dear Eugene,
I've corrected the subject line so that the correct EPA number is reflected.

The label has been corrected and will be submitted to EPA through the "normal" channels, including a cover letter, 8570-1, and the number of copies requested in the original certificate of registration.

At least you can rest easy that it's done. :)

Anne Stout
MANA, Inc.
Mail: PO Box 805, Collierville, TN 38027
Courier: 362 New Byhalia, Ste 1, Collierville, TN 38017
Phone: 901-861-4400
Fax: 901-861-4492

-----Original Message-----

From: Wilson.Eugene@epamail.epa.gov [mailto:Wilson.Eugene@epamail.epa.gov]
Sent: Tuesday, August 28, 2007 12:47 PM
To: Annie Stout
Subject: Re: Dithiopyr Technical, EPA Reg. No. 72167-54

Annie:

Thanks for correcting the mistake. Please, correct this note to address the registration Number for the Dithiopyr Technical we discussed August 23, 2007 at 3:40; PM. Its Reg. No. is 72167-55. I must to put this in EPA's file for this product. We shall also put into this file the revised labeling when it arrives here. Thanks again for helping us get this matter corrected

Best regards,

Eugene

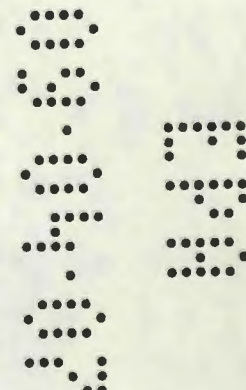
"Annie Stout"
<annies@manainc.com>

08/28/2007 10:25
AM

Eugene Wilson/DC/USEPA/US@EPA

"Kris Venkatesh"
<kvenkatesh@manainc.com>,
"Christie Hitchcock"
<chitchcock@manainc.com>

To
cc



Dear Mr. Wilson,

Thank you for bringing the typo in our final printed label for the referenced product to our attention. We are fixing the label and will send you a revised label as soon as my typesetter has it completed.

Thank you for your help.

Sincerely,
Anne Stout

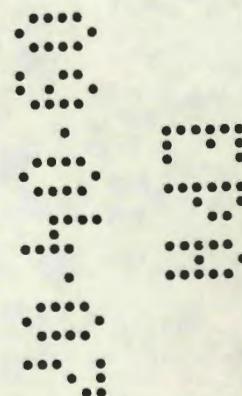
MANA, Inc.

Mail: PO Box 805, Collierville, TN 38027

Courier: 362 New Byhalia, Ste 1, Collierville, TN 38017

Phone: 901-861-4400

Fax: 901-861-4492





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72167-55	2. EPA Product Manager Dan Kenny	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dithiopyr Technical	PM# Herbicide Branch	
5. Name and Address of Applicant (Include ZIP Code) Makhteshim Agan of North America, Inc., as agent for Nations Ag II, LLC, 4515 Falls of Neuse Rd., Suite 300 Raleigh, NC 27609 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated 6-29-07
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of final printed labeling in response to EPA letter 6-29-07.

NOTE: This supercedes our submission dated 7-13-07.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container		<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Anne Stout		Title Registration Specialist		Telephone No. (Include Area Code) 901-861-4400	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature		3. Title Registration Specialist			
4. Typed Name Anne Stout		5. Date 8-28-07			

Nations Ag II

DITHIOPYR TECHNICAL

ACTIVE INGREDIENT:

S, S'-dimethyl 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioate 97.0%

OTHER INGREDIENTS: 3.0%

TOTAL: 100.0%

EPA Reg. No. 72167-55

EPA Est. No. 81134-CHN-001

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

In case of an emergency involving this product call: 1-800-308-5391

ENVIRONMENTAL HAZARDS

Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, ocean or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NDPES) permit and the permitting of authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or the Regional Office of the U.S. EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use this product to formulate into end-use products in any type of equipment made of metal or metal ions (this restriction excludes stainless steel).

For manufacturing and formulation into herbicides only.

For use on established ornamental turf and lawn grasses (including golf course fairways, roughs, and tee boxes), sod farms, non-cropland and industrial sites, established landscape ornamentals, field and container ornamentals.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage, disposal, or cleaning or equipment.

Pesticide Storage: Store in original container.

Pesticide Disposal: Pesticide wastes are toxic. If these wastes cannot be disposed of by use of according to label instructions, they must be disposed of according to federal, state, and local procedures. Contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Triple rinse (or equivalent) the drum. Then, offer for recycling or reconditioning, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Seller warrants that this product conforms within its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. To the extent consistent with applicable law, buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.

Nations Ag II, LLC

4515 Falls of Neuse Road • Raleigh, NC 27609

Net Weight: 55.1 Lbs (25 Kg)

625-0-05

EPA 062907

DITHIOPYR TECHNICAL

Accepted handling
Fincely printed -
via - 8-28-07

Accept. 1st

June 29, 2007

Expires July 1, 2008

E. Wilson

Nations Ag II

DITHIOPYR TECHNICAL

ACTIVE INGREDIENT:

S, S'-dimethyl 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioate97.0%

OTHER INGREDIENTS:3.0%

TOTAL:100.0%

EPA Reg. No. 72167-55

EPA Est. No. 81134-CHN-001

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS
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Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, ocean or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NDPES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or the Regional Office of the U.S. EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not use this product to formulate into end-use products in any type of equipment made of metal or metal ions (this restriction excludes stainless steel).

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Seller warrants that this product conforms within its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. To the extent consistent with applicable law, buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.

Nations Ag II, LLC
4515 Falls of Neuse Road • Raleigh, NC 27609

Net Weight: 55.1 Lbs (25 Kg)

625-0-05

EPA 062907

DITHIOPYR TECHNICAL

Eugene
Wilson/DC/USEPA/US
08/24/2007 11:58 AM

To "Ann Tillman" <Ann@PyxisRC.com>
cc Dan Kenny/DC/USEPA/US, Joanne Miller/DC/USEPA/US
bcc
Subject Re: Dithiopyr CAS Nomenclature

Ann:

Re: Notice of Registration, and Final Printed Labeling for Dithiopyr Technical,
EPA Reg. No. 72167-55, Registered July 1, 2007

I note the many synonyms for dithiopyr in the EPA listing. The CAS Index Name is not set apart from all the others. The third one listed is the CAS Index Name. It is on the labeling accepted June 29, 2007, Please do not change the stamped labeling unless change is required by comments in the Notice of Registration; also, note: the CAS Number was omitted

Please revise the ingredient statement by replacing the chemical expression to that of the CAS Index Name, the one on the stamped label. Concurrently add the CAS Number as a footnote to the CAS Index Name.

I generally use the "A World Compendium, The Pesticide Manual, Eleventh Edition in regard to the CAS Index Names of pesticide active ingredients. This book generally has them correct, but not always. The sure way is to use the CAS Index, which is available in some libraries.

The directions on names of pesticides to be used on labeling is found in PR Notice 97-5.

Resubmit the corrected labeling as final printed labeling under an application to amend labeling, on EPA Application Form 8570-1.

Best regards,

Eugene (703-305-6103)

Resubmit the corrected final printed labeling under EPA application Form 8570-1.

"Ann Tillman" <Ann@PyxisRC.com>



"Ann Tillman"
<Ann@PyxisRC.com>
08/24/2007 11:05 AM

To Eugene Wilson/DC/USEPA/US@EPA
cc
Subject Dithiopyr CAS Nomenclature

Eugene,

Please see attached document from the CAS website.

Ann

Ann M. Tillman
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
Phone (253) 853-7369
Fax (253) 853-5516



CAS nomenclature.pdf



U.S. Environmental Protection Agency Substance Registry System

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Dithiopyr



EPA Source Name: ChemIDStd
Systematic Name: 3,5-Pyridinedicarbothioic acid, 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-, S,S-dimethyl ester
Systematic Source Name: CAS-9CI
CAS Number: 97886-45-8
Classification: Chemical
Molecular Formula: C₁₅H₁₆F₅NO₂S₂
Molecular Weight: 401.42

Other Numbers

This section provides other identifiers associated with this substance, including former CAS numbers, incorrectly used CAS numbers, and retired EPA Identifiers.

None

SMILES Notation

n1c(C(F)F)c(c(CC(C)C)c(c1C(F)(F)F)C(=O)SC)C(=O)SC

Synonyms

Name
3,5-Pyridinedicarbothioic acid, 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-, S,S-dimethyl ester
✓ Dithiopyr
✓ S,S-Dimethyl-2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioate
Dimension
2-(Difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioic acid S,S-dimethyl ester
2-(Difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioic acid, S,S-dimethyl ester



U.S. Environmental Protection Agency Substance Registry System

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Substance List



Click on the linked name to view detailed information about the substance.

Note: The search criteria may exist in synonyms, former CAS Numbers, or other information found on the detailed substance report.

A Substance Comparison Matrix permits side-by-side review of selected substances. To select substances for comparison, check the Compare box. The Substance Comparison Matrix will be shown in a new window. Pause between selections to allow the system to process your request and post to the updated matrix. The Substance Comparison Matrix retains selected items 1) until the Clear All button is selected or 2) the system clears the report at the end of the day. The contents of a Substance Comparison Matrix are available for Download by selecting the Download button in the matrix window.

After selection of substances for the Substance Comparison Matrix, an Information Resources Comparison Matrix Report may be created. The Information Resources Comparison Matrix Report contains information about the substances and the information resources in which they appear. Instructions for generation of this report are given in the Comparison Matrix window.

To go to a particular item in a list, enter the list item number into the Go to Record box and select the Jump button. The list will redraw with the selected item at the top of the list. If the list item number entered is outside the current list range, nothing will be displayed.

Go to Record:

Systematic Name	EPA Registry Name	Classification	CAS Number	TSN	ICTV	EPA ID	Compare?
3,5-Pyridinedicarbohoic acid, 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-, S,S-dimethyl ester	Dithiopyr	Chemical	97886-45-8				<input type="checkbox"/>



MANA

**Makhteshim Agan of
North America, Inc.**

July 13, 2007

Document Processing Desk (FPL)
Registration Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave, NW
Washington DC 20460

Attn: Dan Kenny -Herbicide Branch
Phone: 703-305-7546

Re: Submission of final printed labeling per EPA letter dated 6-29-07
Dithiopyr Technical: EPA Reg. No. 72167-55

Dear Mr. Kenny:

Makhteshim Agan of North America, Inc. as agent for Nations Ag II, LLC is submitting final printed labeling in response to your letter dated 6-29-07.

Enclosed with this application are the following documents:

- Application for Registration (EPA Form 8570-1)
- One copy of final printed labeling

Please contact Jane Rothwell as 901-861-4400 or by email at janer@manainc.com should you have any questions.

Sincerely,

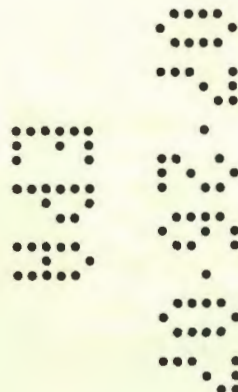
Jane Rothwell
Enclosures

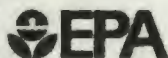
*Revised labeling must be
submitted to reflect - correct
CAS name for Dithiopyr.*

E. Wilson

*88-23-07
3:40 PM*

*MANA agreed to
make correction - soon ?!*





United States
Environmental Protection Agency
Washington, DC 20480

☐
☐
☒

Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72167-55	2. EPA Product Manager Dan Kenny	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dithiopyr Technical	PM# Herbicide Branch	
5. Name and Address of Applicant (Include ZIP Code) Makhteshim Agan of North America, Inc., as agent for Nations Ag II, LLC, 4515 Falls of Neuse Rd., Suite 300 Raleigh, NC 27609 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated 6-29-07
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Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of final printed labeling in response to EPA letter 6-29-07.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Jane Rothwell	Title Registration Specialist	Telephone No. (Include Area Code) 901-861-4400
2. Signature 		6. Date Application Received (Stamped)
3. Title Registration Specialist		
4. Typed Name Jane Rothwell		5. Date 7-13-07

Called: Anne & Jane - 3:40 08-23-07

They said that they

Nations Ag II

will
correct this
name -- To CHS

07.26.07

Unacceptable Chem. Expression

DITHIOPYR TECHNICAL

EPA

E. Wilson

ACTIVE INGREDIENT:

3,5-Pyridinedicarbothioic acid, 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-S,S-dimethyl ester

87.0%

OTHER INGREDIENTS:

3.0%

TOTAL:

100.0%

EPA Reg. No. 72167-55

EPA Est. No. 81134-CHN-001

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

In case of an emergency involving this product call: 1-800-308-5391

ENVIRONMENTAL HAZARDS

Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, ocean or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NDPES) permit and the permitting of authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or the Regional Office of the U.S. EPA.

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It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not use this product to formulate into end-use products in any type of equipment made of metal or metal ions (this restriction excludes stainless steel).

For manufacturing and formulation into herbicides only.

For use on established ornamental turf and lawn grasses (including golf course fairways, roughs, and tee boxes), sod farms, non-cropland and industrial sites, established landscape ornamentals, field and container ornamentals.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage, disposal, or cleaning or equipment.

Pesticide Storage: Store in original container.

Pesticide Disposal: Pesticide wastes are toxic. If these wastes cannot be disposed of by use of according to label instructions, they must be disposed of according to federal, state, and local procedures. Contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Triple rinse (or equivalent) the drum. Then, offer for recycling or reconditioning, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Seller warrants that this product conforms within its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. To the extent consistent with applicable law, buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.

Nations Ag II, LLC


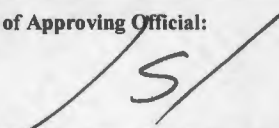
4515 Falls of Neuse Road • Raleigh, NC 27609

Net Weight: 55.1 Lbs (25 Kg)

525-0-05

EPA 052907

DITHIOPYR TECHNICAL

	<p align="center">U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (7505C) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460</p>	<p>EPA Reg. Number: 72167-55</p>	<p>Date of Issuance: June 29, 2007</p> <hr/> <p>Expiration Date July 1, 2008</p>
	<p align="center">NOTICE OF PESTICIDE: <u> X </u> Registration <u> </u> Reregistration (under FIFRA, as amended)</p>	<p>Term of Issuance: Conditional</p>	
		<p>Name of Pesticide Product: Dithiopyr Technical</p>	
<p>Name and Address of Registrant (include ZIP Code): Nations Ag II, LLC c/o Pyxis Regulatory Consulting, Inc 4110 136th St. NW Gig Harbor, WA 98332</p>			
<p>Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.</p>			
<p>On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act</p> <p>Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.</p> <p align="center">This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided that you:</p> <ol style="list-style-type: none"> 1. Add the phrase "EPA Registration No. 72167-55" to the label before you release the product for shipment. <p>Comments continued on page 2 of this Notice of Registration</p> <p>If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product under the enclosed stamped copy of the label constitutes acceptance of these conditions.</p>			
<p>Signature of Approving Official:  Daniel C. Kenny, Chief Herbicide Branch, Registration Division (7505P)</p>		<p>Date: JUN 29 2007</p>	

2. The database supporting the registration of this product is currently being re-evaluated. Depending upon the results of this re-evaluation, additional data requirements may be imposed upon this registration. If required, failure to submit acceptable data to fulfill these requirements may result in registration cancellation in accordance with FIFRA section 6(e), or in registration expiration as described in paragraph 3 below.

3. This registration will expire, without hearing rights on July 1, 2008 unless the Agency receives an amendment to remove the time limitation. Upon receipt of the amendment, the Agency will review all available information and determine whether or not the registration continues to meet the standard for registration. If the Agency determines that the registration does continue to meet the standard for registration, the registrant will be notified and the registration may be amended to remove the expiration. If the Agency determines that the registration no longer meets the standard for registration, the registrant will be notified and the Agency may initiate a Notice of Intent to Cancel or allow the registration to expire. If additional time is needed beyond the original expiration date to make this determination, the registration may be amended to extend the expiration date to allow adequate time to complete the review of all available information.

4. Submit the following data required for the registration of this pesticide product within 1 year from the date of this Notice of Registration:

EPA Guideline Data Number	Guideline Descriptor
830.6317	Storage Stability Study*
830.6320	Corrosion Characteristics Study

*Observations at 0, 3, 6, 9, & 12 month intervals.

5. Correct the Environmental Hazards statement that reads: "for guidance contact your State Water Board or Regional Office of the EPA." To read: "for guidance contact your State Water Board or the Regional Office of the U.S., EPA.

6. Add the preface "To the extent consistent with applicable law" to the sentences that reads: "Buyer assumes the risk of any use contrary to such directions".

7. Submit one (1) copy of the final printed labeling before you release this product for shipment.

8. Submit and/or cite all data required for the registration of this product when the Agency requires all registrants of similar products to submit data; and submit acceptable responses required for re-registration of this product under FIFRA, section 4.

A Stamped copy of the label is enclosed for your records.

Enclosure

Dithiopyr Technical

ACTIVE INGREDIENT:

S, S'-dimethyl 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioate(*) 97.0%

OTHER INGREDIENTS 3.0%

TOTAL 100.0%

(* CAS No. 97886-45-8)

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

In case of an emergency involving this product call: 1-800-308-5391

EPA Reg. No 72167-
EPA Est. No: xxxx

Net Weight: XXXX

Nations Ag II, LLC
911 Western Ave., Suite 206
Seattle, WA 98104

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

JUN 29 2007
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
72167-55

ENVIRONMENTAL HAZARDS

Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, ocean or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NDPES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use this product to formulate into end-use products in any type of equipment made of metal or metal ions (this restriction excludes stainless steel).

For manufacturing and formulation into herbicides only.

For use on established ornamental turf and lawn grasses (including golf course fairways, roughs, and tee boxes), sod farms, non-cropland and industrial sites, established landscape ornamentals, field and container ornamentals.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage, disposal, or cleaning or equipment.

Pesticide Storage: Store in original container.

Pesticide Disposal: Pesticide wastes are toxic. If these wastes cannot be disposed of by use of according to label instructions, they must be disposed of according to federal, state, and local procedures. Contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Triple rinse (or equivalent) the drum. Then, offer for recycling or reconditioning, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Seller warrants that this product conforms within its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. Buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. To the extent consistent with applicable laws, in no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Note to the File

June 29, 2007

EPA File Symbol 72167-55

In the Product Chemistry review dated April 17, 2007, it was determined that the proposed formulation for the subject technical product contained different impurities than the cited technical product. Therefore, an Ames assay was required to test the subject technical product for mutagenicity as a screen for possible toxicological differences and/or concerns.

A preliminary review was conducted by Byron Backus (TRB/RD), and the results were discussed with Dan Kenny (HB/RD). The Ames assay was conducted in an acceptable manner and was deemed scientifically sound. The results of the test showed that the proposed formulation is negative for mutagenicity. The studies will be submitted to HED for a formal written review on a confirmatory basis.

Questions have arisen regarding whether the process of using the Ames assay (i.e., screen for mutagenicity) is appropriate as the only screen for toxicological concerns. RD and HED will be planning discussions to determine if this process should continue or be amended to include additional studies. Therefore, the subject product is being registered with a one year expiration to allow time for those discussions. If the Agency determines more data is needed to address toxicological questions, the registration will be amended to require those studies. If the Agency determines that no additional data is needed, the Agency will amend the registration to remove the expiration.

A handwritten signature in black ink, appearing to read "D. Kenny".

Daniel Kenny



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

NOTICE OF PESTICIDE:

☒ Registration
Reregistration
(under FIFRA, as amended)

EPA Reg.
Number:
72167-55

Date of Issuance:

Term of Issuance: Conditional
With Expiration Date
of One Year from Date
Issued

Name of Pesticide Product:

Dithiopyr Technical

Name and Address of Registrant (Include ZIP Code):

Nations Ag II, LLC
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

1. Add the phrase "EPA Registration No. 72167-55) to the label before you release the product for shipment.

COMMENTS CONTINUED ON PAGE 2 OF THIS NOTICE OF REGISTRATION

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product under the enclosed stamped copy of the label constitutes acceptance of these conditions.

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

Signature of Approving Official:

Date:

2. Submit the following data required for the registration of this pesticide product within 1 year from the date of this Notice of Registration:

<u>EPA Guideline Data Number</u>	<u>Guideline Descriptor</u>
830.6317	Storage Stability Study
830.6320	Corrosion Characteristics Study

3. Submit an acceptable "Reverse Mutation Assay Using Bacteria", EPA Guidelines Number 870.5100.
4. Correct the Environmental Hazards statement that reads: "For Guidance contact your State Water Board **of** Regional Office of the EPA." to read: For guidance contact your State Water Board or the Regional Office of the U.S., EPA.
5. Delete the use sites: sod farms, non-cropland and industrial uses sites; and field and container ornamentals.
6. Add the preface "to the extent consistent with applicable law" to the sentence that reads: "Buyer assumes the risk of any use contrary to such directions.
7. Submit one (1) copy of the final printed labeling before you release this product for shipment.
8. Submit and/or cite all data required for the registration of this product when the Agency requires all registrants of similar products to submit data; and submit acceptable responses required for reregistration of this product under FIFRA, section 4.
A Stamped copy of the label is enclosed for your records.

Enclosure



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72167-LU	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Nations Ag II, LLC/Trinexapac-ethyl Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Nations Ag II, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of additional data.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ann Tillman	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Ann Tillman	5. Date 6/4/07	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 7, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PYXIS REGULATORY CONSULTING, INC.
NATIONS AG II, LLC
4110 136TH STREET, NW
GIG HARBOR, WA 98332-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 06-JUN-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

PYXIS REGULATORY CONSULTING, INC.

471472-00

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

June 4, 2007

COURIER DELIVERY

Joanne Miller (PM 23)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Nations Ag II, LLC. – Trinexapac-ethyl Technical (EPA Reg. No. 72167-LU)
Submission of Additional Data

Dear Ms. Miller,

On behalf of Nations Ag II LLC, enclosed please find the following toxicity study to support the registration of Trinexapac-ethyl Technical.

Enclosed, please find the following:

1. Application for Registration (EPA Form 8570-1)
2. Letter of Authorization
3. Product Specific Data (3 copies):

7147201

Volume 1 870.5100

Kraft, M, Reverse Mutation Assay using Bacteria (Salmonella typhimurium and Escherichia coli) with Trinexapac-ethyl Technical..

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures

PYXIS REGULATORY CONSULTING, INC.

471475-00

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

June 4, 2007

COURIER DELIVERY

Joanne Miller (PM 23)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Nations Ag II, LLC. – Dithiopyr Technical (EPA Reg. No. 72167-LL)
Submission of Additional Data

Dear Ms. Miller,

On behalf of Nations Ag II LLC, enclosed please find the following toxicity study to support the registration of Dithiopyr Technical.

Enclosed, please find the following:

1. Application for Registration (EPA Form 8570-1)
2. Letter of Authorization
3. Product Specific Data (3 copies):

47147501

Volume 1 870.5100

Kraft, M, Reverse Mutation Assay using Bacteria (*Salmonella typhimurium* and *Escherichia coli*) with Dithiopyr Technical..

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 7, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NATIONS AG II, LLC
4515 FALLS OF NEUSE ROAD, SUITE 300
RALEIGH, NC 27609-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 06-JUN-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

MEMORANDUM

DATE: / /

TO: , Regulatory Manager

FROM: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission
 ☐ partially accepted submission
 ☐ rejected submission

PYXIS REGULATORY CONSULTING, INC.

471472-00

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

June 4, 2007

COURIER DELIVERY

Joanne Miller (PM 23)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Nations Ag II, LLC. – Trinexapac-ethyl Technical (EPA Reg. No. 72167-LU)
Submission of Additional Data

Dear Ms. Miller,

On behalf of Nations Ag II LLC, enclosed please find the following toxicity study to support the registration of Trinexapac-ethyl Technical.

Enclosed, please find the following:

1. Application for Registration (EPA Form 8570-1)
2. Letter of Authorization
3. Product Specific Data (3 copies):

7147201

Volume I 870.5100

Kraft, M, Reverse Mutation Assay using Bacteria (Salmonella typhimurium and Escherichia coli) with Trinexapac-ethyl Technical..

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 27, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NATIONS AG II, LLC
4515 FALLS OF NEUSE ROAD, SUITE 300
RALEIGH, NC 27609-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 20-APR-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 86-5, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents.

If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 86-5. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below.

These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels.

The rejected studies and their deficiencies are described below.

Rejected Study [01]:

* Your Statement of No Data Confidentiality Claims is contradicted by the marking(s) on page(s) 2-7 of the study. If you do not intend to make Supplemental Claims of Data Confidentiality you can explicitly override these markings when you resubmit this study.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

April 17, 2007

OVERNIGHT DELIVERY

Joanne Miller (PM 23)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Nations Ag II, LLC. – Dithiopyr Technical (EPA Reg. No. 72167-LL)
Submission of Additional Reports

Dear Ms. Miller,

On behalf of Nations Ag II, LLC, we are submitting two additional reports to support the application for registration of Dithiopyr Technical. These reports were prepared at the request of Dr. Mathur. In support of this submission, we submit the following documents:

1. Application for a New Pesticide Registration (EPA Form 8570-1)
2. Letter of Authorization
3. Product Specific Data:

Reject (01)

47109602

Volume 1	830.1800	Tillman, A. M. Addendum to MRID 469748-02. Dithiopyr Technical – Preliminary Analysis.
Volume 2	830.6313, 830.6314, 830.6315, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, 830.7100, 830.7220	Tillman, A. M. Waiver Request for Certain Data Requirements for Dithiopyr Technical

Please feel free to contact me (ann@pyxisrc.com; 253-853-7369) if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures

Rh.

See Xs

Revd 06-13-07

Em Wilson

Dithiopyr Technical

ACTIVE INGREDIENT:

S, S'-dimethyl 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioate(*) 97.0%

OTHER INGREDIENTS 3.0%

TOTAL 100.0%

(* CAS No. 97886-45-8)

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

In case of an emergency involving this product call: 1-800-308-5391

EPA Reg. No 72167-

EPA Est. No: xxxx

Net Weight: XXXX

Nations Ag II, LLC
911 Western Ave., Suite 206
Seattle, WA 98104

ENVIRONMENTAL HAZARDS

Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, ocean or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NDPES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA. *or* *X*

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use this product to formulate into end-use products in any type of equipment made of metal or metal ions (this restriction excludes stainless steel).

For manufacturing and formulation into herbicides only.

For use on established ornamental turf and lawn grasses (including golf course fairways, roughs, and tee boxes), ~~seed farms, non-cropland and industrial sites, established landscape ornamentals, field and container ornamentals.~~ *X* *X* *These sites are not on Dow's Tech Dir.*

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage, disposal, or cleaning or equipment.

Pesticide Storage: Store in original container.

Pesticide Disposal: Pesticide wastes are toxic. If these wastes cannot be disposed of by use of according to label instructions, they must be disposed of according to federal, state, and local procedures. Contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Triple rinse (or equivalent) the drum. Then, offer for recycling or reconditioning, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

To the extent consistent with applicable laws *X*
Seller warrants that this product conforms within its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. Buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. To the extent consistent with applicable laws, in no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.

Reviewed 05-21-07

REL. NAC
REL. / NAC
E. Wilson

Dithiopyr Technical

ACTIVE INGREDIENT:

S, S'-dimethyl 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3,5-pyridinedicarbothioate(*) 97.0%

OTHER INGREDIENTS 3.0%

TOTAL 100.0%

(* CAS No. 97886-45-8)

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

In case of an emergency involving this product call: 1-800-308-5391

EPA Reg. No 72167-
EPA Est. No: xxxx

X

?

Net Weight: XXXX

25kg

X

Nations Ag II, LLC
911 Western Ave., Suite 206
Seattle, WA 98104

ENVIRONMENTAL HAZARDS

Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, ocean or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NDPES) permit and the permitting of authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use this product to formulate into end-use products in any type of equipment made of metal or metal ions (this restriction excludes stainless steel).

For manufacturing and formulation into herbicides only.

For use on established ornamental turf and lawn grasses (including golf course fairways, roughs, and tee boxes), sod farms, non-cropland and industrial sites, established landscape ornamentals, field and container ornamentals.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage, disposal, or cleaning or equipment.

Pesticide Storage: Store in original container.

Pesticide Disposal: Pesticide wastes are toxic. If these wastes cannot be disposed of by use of according to label instructions, they must be disposed of according to federal, state, and local procedures. Contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Triple rinse (or equivalent) the drum. Then, offer for recycling or reconditioning, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Seller warrants that this product conforms within its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. Buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. To the extent consistent with applicable laws, in no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.



Joanne Miller/DC/USEPA/US
06/11/2007 08:12 AM

To Eugene Wilson/DC/USEPA/US@EPA
cc
bcc
Subject Fw: EPA File Symbol 72167-LL Final Report

Gene,

Based on Dan's email to me below, please do a bean and get this study (pdf attached) to Byron in TRB for review. Don't wait any longer for the paper copy to get into us. I'll give Byron the MRID No. when it comes in. Thanks.

Joanne

----- Forwarded by Joanne Miller/DC/USEPA/US on 06/11/2007 08:11 AM -----



Dan Kenny/DC/USEPA/US
06/07/2007 06:22 PM

To miller.joanne@epa.gov
cc
Subject Fw: EPA File Symbol 72167-LL Final Report

We should see how quickly we can get these Ames assays looked at. I had to do some wheeling and dealing on these renegotiations, so if we can get them done on the quick side, I'd like to.

Thanks,
Dan

----- Forwarded by Dan Kenny/DC/USEPA/US on 06/07/2007 06:21 PM -----



"Ann Tillman"
<Ann@PyxisRC.com>
06/04/2007 08:00 PM

To Dan Kenny/DC/USEPA/US@EPA
cc Joanne Miller/DC/USEPA/US@EPA, Eugene Wilson/DC/USEPA/US@EPA, "Janelle Kay" <Janelle@PyxisRC.com>, "Kris Venkatesh" <kvenkatesh@manainc.com>, "Ephi Gur" <ephi@manainc.com>
Subject EPA File Symbol 72167-LL Final Report

Dan,

You and Janelle had discussed our forwarding you the final report for the Ames study conducted with Nations Ag II LLC's Dithiopyr Technical (72167-LL) by email in order to get a head start on the review to meet the revised PRIA deadline. Attached please find the electronic version of that report. I will send the paper copies to Joanne by courier today. Please let me know if you have any questions. Thanks.

Ann

Ann M. Tillman
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
Phone (253) 853-7369
Fax (253) 853-5516



20070604 Dithiopyr Ames report.pdf

BIOSERVICE

SCIENTIFIC
LABORATORIES
GmbH

Reverse Mutation Assay using Bacteria

(Salmonella typhimurium and Escherichia coli)

with

DITHIOPYR TECHNICAL

Study Completion Date June 4, 2007
Report

BSL BIOSERVICE Project No.: 071407

Guideline Number 870.5100
Author Michael Kraft

Sponsor:

Nations AG II LLC

c/o Pyxis Regulatory Consulting, Inc.

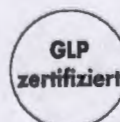
4110 136th St. NW

Gig Harbor, WA 98332

USA

BSL BIOSERVICE Scientific Laboratories GmbH

Behringstrasse 6 82152 Planegg, Germany
Telefon +49(0)89-899 65 00 Fax +49(0)89-899 65 011
e-mail: info@bioservice.com www.bioservice.com
Geschäftsführer: Dr. Wolfram Riedel
Amtsgericht München HRB 109 770
Erfüllung und Gerichtsstand München
Raiffeisenlandesbank Oberösterreich, BLZ 740 201 00, Kto. 4 100 002 016, Swift-BIC: RZ00DE77, IBAN: DE31 7402 0100 4100 0020 16
Deutsche Bank München, BLZ 700 700 24, Kto. 9 407 750 Swift-BIC: DEUTDE33, IBAN: DE52 7007 0024 0940 7750 00



Akkreditiert durch
Zentralstelle der Länder
für Gesundheitsschutz
bei Arzneimitteln
und Medizinprodukten
ZLG-P-986.96.01



United States
Environmental Protection Agency
Washington, DC 20480

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72167-LL	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Nations Ag II, LLC/Dithiopyr Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Nations Ag II, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 62719-425/707-244 Product Name Dithiopyr Technical

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of additional data at the request of EPA (S. Mathur).

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
If "Yes" Unit Packaging wgt. No. per container			If "Yes" Package wgt. No. per container	Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ann Tillman	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Ann Tillman	5. Date 4/17/07	

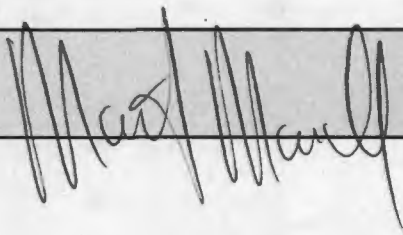
Recommendation of Division Director Negotiated Due Dates		
Decision#: 371880	Registration#: 72167-LL	Petition #: NA
Fee Category: R-031	PRIA Decision Time Frame:	
Submitted by: Eugene Wilson	Branch: HD	Date: 05-15-07
Company: Nations AG II, LLC		
Original Due Date: May 23, 2007	Proposed New Due Date: July 23, 2007	
Previous Negotiated Due Dates: None		
Is the "Fix" in-house? No	If not, date "Fix" expected: May 25, 2007	
<p>Issue (describe in detail): TRB determined that this pending Dithiopyr Technical has different impurities, than the Dithiopyr Technical (62719-425) that was cited as being identical or similar. To register this new dithiopyr technical, a toxicological finding that these two technicals are similar is considered appropriate. The study that is considered appropriate for this purpose is the Ames Assay (OPPTS 870-5100, "Bacterial Reverse Gene Mutation Assay). TRB has indicated that an Ames Assay study would be helpful in their evaluation of the toxicological difference in these two dithiopyr technicals.</p>		
<p>Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates): On May 1, 2007 the Agent for Nation Ag II LLC, Pyxis regulatory Consulting, Inc was informed by a FAXed note that this Agency had determined that the proposed product was not identical or similar to the registered product, Dow's Dithiopyr Technical. They were requested to revise their application and submit the Certification with Respect to Citation of Data, EPA Form 8570-34. The Agent was informed by telephone that toxicological data would be required to show that the impurities in their dithiophyr technical did not add to the risks of this pesticide product when compared with presently registered dithiopyr technical. By e-mail dated May 14, 2007 to Dan Kenny, Pyxis requested that this Agency extend the PRIA due date to July 23, 2007.</p>		

Rationale for Proposed Due Date:

The proposed due date, which is 60 days past the existing May 23, 2007 due date, appears to be reasonable provided that the Ames Assay Study is submitted no later than May 25, 2007, the date stated by Pyxis. If they conform to their commitment, HB will be able to make a regulatory decision by July 23, 2007.

Other Comments:

Your approval of this extension is indicated. If the Ames Assay indicates that this new Technical Dithiopyr is a mutagenic agent, other studies may be required and a reconsideration of an extension of the PRIA date must be addressed, again; or other actions as appropriate. .

Approve: ☒**Disapprove:** ☐**If disapproved, action to be taken:****Issue a No-Grant Letter.****OD or DOD Signature:****Date:**

5-21-07



"Janelle Kay"
<Janelle@PyxisRC.com>
05/14/2007 03:08 PM

To Dan Kenny/DC/USEPA/US@EPA, Joanne
Miller/DC/USEPA/US@EPA, Eugene
Wilson/DC/USEPA/US@EPA
cc "Ann Tillman" <Ann@PyxisRC.com>

bcc

Subject Nations Ag II Dithiopyr Technical (EPA File Symbol No.
72167-LL)

Dan,

Thanks for your voice mail this morning regarding the PRIA renegotiation for Dithiopyr Technical (EPA File Symbol No. 72167-LL). As per our communications, we would like to request a PRIA extension to July 23 (~60 days from the PRIA due date of May 23, 2007). We will be submitting Ames data to support our substantial similarity claim and we expect these data will be completed early next week (possibly by late this week). Therefore, our request is based on the assumption we will be able to submit the data to the Agency no later than May 25, 2007. I hope this extension request is acceptable to the Agency and please let me know if you have any questions or need any additional information.

Regards,
Janelle
Janelle Kay
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
P: 253-853-7369
F: 253-853-5516
E: Janelle@PyxisRC.com

Nations Ag II

May 11, 2006

Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

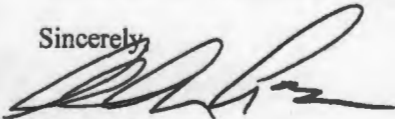
RE: Letter of Authorization

To Whom It May Concern:

Nations Ag II, LLC (EPA Company No. 72167) hereby appoints and authorizes Pyxis Regulatory Consulting, Inc. to act as Agent on behalf of Nations Ag II, LLC before the U.S. Environmental Protection Agency in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please call me at 253-812-8603.
Thank you for your consideration.

Sincerely,



Allan Las
Chief, US Product Development Officer

cc: Pyxis Regulatory Consulting, Inc.



PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

May 16, 2007

OVERNIGHT DELIVERY

Joanne Miller (PM 23)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Nations Ag II, LLC. – Dithiopyr Technical (EPA Reg. No. 72167-LL)
Submission of Revised Label

Dear Ms. Miller,

Enclosed please find a copy of the revised Dithiopyr Technical label in response to a fax from Eugene Wilson dated May 14, 2007. The following documents are enclosed:

1. Application for a New Pesticide Registration (EPA Form 8570-1)
2. Five (5) copies of the revised label

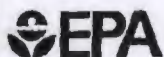
Please feel free to contact me (ann@pyxisrc.com; 253-853-7369) if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures



United States
Environmental Protection Agency
Washington, DC 20480

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72167-LL	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Nations Ag II, LLC/Dithiopyr Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Nations Ag II, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of amended label per E. Wilson fax dated 5/14/2007

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
Certification must be submitted If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ann Tillman	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Ann Tillman	5. Date 5/16/07	



"Janelle Kay"
<Janelle@PyxisRC.com>
05/14/2007 03:08 PM

To Dan Kenny/DC/USEPA/US@EPA, Joanne
Miller/DC/USEPA/US@EPA, Eugene
Wilson/DC/USEPA/US@EPA
cc "Ann Tillman" <Ann@PyxisRC.com>

bcc

Subject Nations Ag II Dithiopyr Technical (EPA File Symbol No.
72167-LL)

Dan,

Thanks for your voice mail this morning regarding the PRIA renegotiation for Dithiopyr Technical (EPA File Symbol No. 72167-LL). As per our communications, we would like to request a PRIA extension to July 23 (~60 days from the PRIA due date of May 23, 2007). We will be submitting Ames data to support our substantial similarity claim and we expect these data will be completed early next week (possibly by late this week). Therefore, our request is based on the assumption we will be able to submit the data to the Agency no later than May 25, 2007. I hope this extension request is acceptable to the Agency and please let me know if you have any questions or need any additional information.

Regards,
Janelle
Janelle Kay
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
P: 253-853-7369
F: 253-853-5516
E: Janelle@PyxisRC.com

Nations Ag II



May 11, 2006

Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

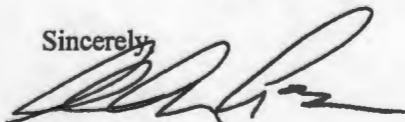
RE: Letter of Authorization

To Whom It May Concern:

Nations Ag II, LLC (EPA Company No. 72167) hereby appoints and authorizes Pyxis Regulatory Consulting, Inc. to act as Agent on behalf of Nations Ag II, LLC before the U.S. Environmental Protection Agency in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please call me at 253-812-8603.
Thank you for your consideration.

Sincerely,



Allan Las
Chief, US Product Development Officer

cc: Pyxis Regulatory Consulting, Inc.

MEMORANDUM

DATE: 6/11/07

TO: PM 23, Regulatory Manager

FROM: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a:

- ☒ fully accepted submission
- ☐ partially accepted submission
- ☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460
Potomac Yard (South Building)
2777 S. Crystal Drive,
Arlington, VA

Fax Number (703) 605-0781

OFFICE OF Pesticide Programs, Herbicide Branch

FACSIMILE REQUEST/ COVER SHEET

Send FAX TO:

Name:

Ms Ann Tillman

OFF:

Pyxis Regulatory Consulting Inc.

FAX Phone Number

253-853 5511

Office Phone Number

253-853-7369

FROM:

Name:

Eugene Wilson

Division/Branch:

Registration Div., Herbicide Br.

Office Phone Number:

703 305 6103

Office Room Number:

57326

Mail Code:

7505P

DATE:

05-14-07

TIME:

3:10 PM.

NUMBER OF PAGES (WITH COVER SHEET):

3 4

Ann: Re: 72167-hh

1. Please correct and submit 5 copies of the Proposed Labeling for this New Product.

2. I understand that other issues are being addressed - Ames Study & Extension of PRTA date.

Eugene Wilson
Eugene M. Wilson
Risk Manager (23)

Call if there are questions.

Plk Rec'd 05-14-07 Em. Wilson

Dithiopyr Technical

ACTIVE INGREDIENT:

3,5-Pyridinedicarbothioic acid, 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-S,S-dimethyl ester..... 97.0%

OTHER INGREDIENTS 3.0%

TOTAL 100.0%

*CAS No. 97886-45-8

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

In case of an emergency involving this product call: 1-800-308-5391

EPA Reg. No 72167-
EPA Est. No: xxxx

Net Weight: XXXX

Nations Ag II, LLC
911 Western Ave., Suite 206
Seattle, WA 98104



ENVIRONMENTAL HAZARDS

Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, ocean or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NDPES) permit and the permitting of authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For manufacturing and formulation into herbicides only.

For use on established ornamental turf and lawn grasses (including golf course fairways, roughs, and tee boxes), sod farms, non-cropland and industrial sites, established landscape ornamentals, field and container ornamentals.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage, disposal, or cleaning or equipment.

Pesticide Storage: Store in original container.

Pesticide Disposal: Pesticide wastes are toxic. If these wastes cannot be disposed of by use of according to label instructions, they must be disposed of according to federal, state, and local procedures. Contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Triple rinse (or equivalent) the drum. Then, offer for recycling or reconditioning, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Seller warrants that this product conforms within its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. Buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.

To the extent Consistent with applicable Law.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

May 9, 2007

OVERNIGHT DELIVERY

Joanne Miller (PM 23)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Nations Ag II, LLC. – Dithiopyr Technical (EPA Reg. No. 72167-LL)
Submission of Revised Documents per Product Chemistry Review

Dear Ms. Miller,

On behalf of Nations Ag II, LLC, we are submitting the following documents in response to a fax received on May 1 with the TRB product chemistry review. Corrections have been made to the following documents in support of the application for registration of Dithiopyr Technical:

1. Application for a New Pesticide Registration (EPA Form 8570-1)
2. Certification with Respect to Citation of Data (EPA Form 8750-34)
3. Revised Confidential Statement of Formula (EPA Form 8570-4)
4. Two (2) copies of the revised product label
5. Revised Agency Internal Use Copy of the Data Matrix dated May 1, 2007
6. Revised Public Use Copy of the Data Matrix dated May 1, 2007
7. Letter of Authorization

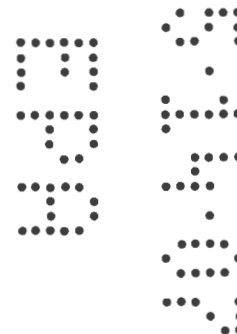
Please feel free to contact me (ann@pyxisrc.com; 253-853-7369) if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72167-LL	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Nations Ag II, LLC/Dithiopyr Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Nations Ag II, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated <u>5/1/07</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Response to EPA Product chemistry Review (dated April 16, 2007).

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ann Tillman	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Ann Tillman	5. Date 5/9/07	



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401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Nations Ag II, LLC c/o Pyxis Regulatory Consulting 4110 136th St. NW Gig Harbor, WA 98332	EPA Registration Number/File Symbol 72167-LL
Active Ingredient(s) and/or representative test compound(s) Dithiopyr	Date May 9, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food and Feed; Non-food crop	Product Name Dithiopyr Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Ann M. Tillman

Date

May 9, 2007

Typed or Printed Name and Title


Ann M. Tillman, Agent

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401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX


Date May 1, 2007			EPA Reg No./File Symbol 72167-LL		Page 1 of 6
Applicant's/Registrant's Name & Address Nations Ag II, LLC 911 Western Avenue, Suite 206 Seattle, WA 98104			Product Dithiopyr Technical		
Ingredient Dithiopyr					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements					
830.1550	Product Identity and Composition	46974801	Nations Ag II, LLC	OWN	
830.1600	Description of Materials Used to Produce the Product	46974801	Nations Ag II, LLC	OWN	
830.1620	Description of Production Process	46974801	Nations Ag II, LLC	OWN	
830.1650	Description of Formulation Process				Not required ¹
830.1670	Discussion of Formation of Impurities	46974801	Nations Ag II, LLC	OWN	
830.1700	Preliminary Analysis	46974802	Nations Ag II, LLC	OWN	
830.1750	Certified Limits	46974801	Nations Ag II, LLC	OWN	
830.1800	Enforcement Analytical Method	46974802	Nations Ag II, LLC	OWN	
830.6302	Color	46974803	Nations Ag II, LLC	OWN	
830.6303	Physical State	46974803	Nations Ag II, LLC	OWN	
830.6304	Odor	46974803	Nations Ag II, LLC	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	46974803 47109602	Nations Ag II, LLC	OWN	Waiver
830.6314	Oxidation/Reduction: Chemical Incompatibility	47109602	Nations Ag II, LLC	OWN	Waiver
830.6315	Flammability	47109602	Nations Ag II, LLC	OWN	Waiver
Signature 			Name and Title Ann M. Tillman, Consultant		Date May 1, 2007

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401 M Street, S.W.
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DATA MATRIX


Date May 1, 2007			EPA Reg No./File Symbol 72167-LL		Page 2 of 6
Applicant's/Registrant's Name & Address Nations Ag II, LLC 911 Western Avenue, Suite 206 Seattle, WA 98104			Product Dithiopyr Technical		
Ingredient Dithiopyr					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6316	Explosibility	47109602	Nations Ag II, LLC	OWN	Waiver
830.6317	Storage Stability	47109602	Nations Ag II, LLC	OWN	Conduct as condition of registration
830.6319	Miscibility				Not required ²
830.6320	Corrosion Characteristics	47109602	Nations Ag II, LLC	OWN	Conduct as condition of registration
830.6321	Dielectric Breakdown Voltage				Not required ²
830.7000	pH	46974803	Nations Ag II, LLC	OWN	
830.7050	UV/Visible Absorption	46974803	Nations Ag II, LLC	OWN	
830.7100	Viscosity				Not required ²
830.7200	Melting Point/Melting Range	46974803	Nations Ag II, LLC	OWN	
830.7220	Boiling Point/Boiling Range				Not required ³
830.7300	Density/Relative Density/Bulk Density	46974803	Nations Ag II, LLC	OWN	
830.7370	Dissociation Constants in Water	Cite-All		PAY	
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	Cite-All		PAY	
Signature 			Name and Title Ann M. Tillman, Consultant		Date May 1, 2007

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DATA MATRIX


Date May 1, 2007			EPA Reg No./File Symbol 72167-LL		Page 3 of 6
Applicant's/Registrant's Name & Address Nations Ag II, LLC 911 Western Avenue, Suite 206 Seattle, WA 98104			Product Dithiopyr Technical		
Ingredient Dithiopyr					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				See 830.7560
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7560
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	Cite-All		PAY	
830.7860	Water Solubility, Generator Column Method				See 830.7840
830.7950	Vapor Pressure	Cite-All		PAY	
870.1100	Acute Oral Toxicity: Rat	Cite-All		PAY	
870.1200	Acute Dermal Toxicity: Rat	Cite-All		PAY	
870.1300	Acute Inhalation Toxicity: Rat	Cite-All		PAY	
870.2400	Primary Eye Irritation: Rabbit	Cite-All		PAY	
870.2500	Primary Dermal Irritation	Cite-All		PAY	
870.2600	Dermal Sensitization	Cite-All		PAY	
Signature 			Name and Title Ann M. Tillman, Consultant		Date May 1, 2007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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DATA MATRIX

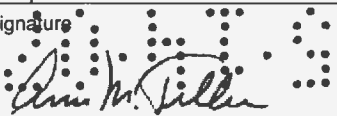
Date May 1, 2007			EPA Reg No./File Symbol 72167-LL		Page 4 of 6
Applicant's/Registrant's Name & Address Nations Ag II, LLC 911 Western Avenue, Suite 206 Seattle, WA 98104			Product Dithiopyr Technical		
Ingredient Dithiopyr					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Nations Ag II, LLC will make offers-to-pay to the following companies on the March 31, 2007 Data Submitters List for Dithiopyr.					
Dithiopyr Generic Data Requirements					
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Bayer Crop Science LP	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Lebanon Seaboard Corp.	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		PBI/Gordon Corp.	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Southern States Coop., Inc.	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Totalturf Consulting LLC	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		United Industries Corp.	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		The Andersons Lawn Fertilizer Division	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Chemisco	PAY	
Signature 			Name and Title Ann M. Tillman, Consultant		Date May 1, 2007

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DATA MATRIX


Date May 1, 2007			EPA Reg No./File Symbol 72167-LL		Page 5 of 6
Applicant's/Registrant's Name & Address Nations Ag II, LLC 911 Western Avenue, Suite 206 Seattle, WA 98104			Product Dithiopyr Technical		
Ingredient Dithiopyr					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		AgriLiance LLC	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Lesco Inc.	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Loveland Products	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Dow Agrosiences LLC	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Spray Drift Task Force	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Outdoor Residential Exposure Task Force, LLC	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Residential Exposure Joint Venture	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Control Solutions Inc.	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		FIFRA Endangered Species Task Force LLC	PAY	
Signature 			Name and Title Ann M. Tillman, Consultant		Date May 1, 2007

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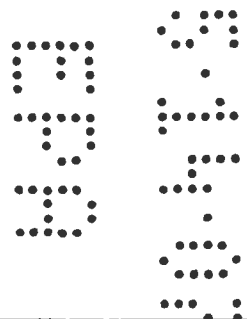
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DATA MATRIX

Date May 1, 2007			EPA Reg No./File Symbol 72167-LL		Page 6 of 6
Applicant's/Registrant's Name & Address Nations Ag II, LLC 911 Western Avenue, Suite 206 Seattle, WA 98104			Product Dithiopyr Technical		
Ingredient Dithiopyr					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Gro-Pro LLC	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Etigra LLC	PAY	
Signature 			Name and Title Ann M. Tillman, Consultant		Date May 1, 2007

Endnotes for Data Matrix for Dithiopyr Technical

-
- ¹ **830.1650** - Per OPPTS 830.1000, these data are not required for the registration of a technical product. See 830.1620 for production process information.
- ² **830.6319, 830.6321, 830.7100** – Per OPPTS 830.1000, these data are not required for registration of a technical grade product.
- ³ **830.7220** – Dithiopyr Technical is a solid at room temperature. Boiling point data are not required for solids.



Nations Ag II



May 11, 2006

Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

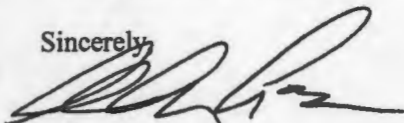
RE: Letter of Authorization

To Whom It May Concern:

Nations Ag II, LLC (EPA Company No. 72167) hereby appoints and authorizes Pyxis Regulatory Consulting, Inc. to act as Agent on behalf of Nations Ag II, LLC before the U.S. Environmental Protection Agency in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please call me at 253-812-8603.
Thank you for your consideration.

Sincerely,



Allan Las
Chief, US Product Development Officer

cc: Pyxis Regulatory Consulting, Inc.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460
Potomac Yard (South Building)
2777 S. Crystal Drive,
Arlington, VA

Fax Number (703) 605-0781

OFFICE OF Pesticide Programs, Herbicide Branch

FACSIMILE REQUEST/ COVER SHEET

Send FAX TO:

Name:

Ms. Ann Tillman

OFF:

Pyxis Regulatory Consulting, Inc.

FAX Phone Number

253-853-5516

Office Phone Number

253-853-7369

FROM:

Name:

Eugene Wilson

Division/Branch:

Registration Div., Herbicide Br.

Office Phone Number:

703 305 6103

Office Room Number:

57326

Mail Code:

7505P

DATE: 05-01-07

TIME:

3:00 PM

NUMBER OF PAGES (WITH COVER SHEET):

3

Ann: Re: 72167-66 Dithiopyr Technical
for Vation Ag II, LLC.

As requested attached is copy of Acute
Tox Review of subject application
to Register a New Pesticide Product.

Eugene M. Wilson
Eugene M. Wilson
Risk Manager (23)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

TECHNICAL REVIEW BRANCH
SIMILARITY CLINIC DETERMINATION

18/APR/2007

MEMORANDUM

Subject: Name of Pesticide Product: Dithiopyr Technical
EPA File Symbol: 72167-LL
DP Barcode: D334269
Decision No.: 371880
PC Code: 128994 Dithiopyr

From: Rick J. Whiting
Technical Review Branch (TRB) *RJW*
Registration Division (7505P) *fla/cu*

To: Eugene Wilson, RM Team 23
Herbicide Branch
Registration Division (7505P)

Applicant: Nations Ag II, LLC
911 Western Avenue, Suite 206
Seattle, WA 98104

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
128994 Dithiopyr technical (CAS No. 97886-45-8)	97.0%
<u>Inert Ingredient(s):</u>	<u>3.0%</u>
Total:	100.0%

ACTION REQUESTED: The Risk Manager requests:

“Please review acute toxicity data cited as me-too. If this is a me-too, we can use the data cited.”

BACKGROUND: The registrant is claiming that their product EPA File Symbol 72167-LL, Dithiopyr Technical, is substantially similar to EPA Reg. No. 62719-425, MON 15100 Herbicide (transferred from EPA Reg. No. 524-430 / 707-244) and has submitted a CSF and label. In addition, the registrant is using the “cite-all” method for the acute toxicity data requirements. After searching the OPP electronic file databases, TRB was able to locate reviews (Anderson; 13-OCT-1988 and Chin; 22-OCT-1990) for six acute toxicity studies that were used to support the registration of EPA Reg. No. 524-430.

COMMENTS AND RECOMMENDATIONS:

1. TRB has compared the CSFs and labels of 72167-LL with that of EPA Reg. No. 62719-425. After this comparison, TRB concludes that 72167-LL is (toxicologically) substantially similar to EPA Reg. No. 62719-425.

2. Based on the acute toxicity studies submitted to support the registration of EPA Reg. No. 62719-425 (EPA Reg. No. 524-430 and 707-244), the acute toxicity profile for Dithiopyr Technical, EPA File Symbol 72167-LL, is as follows:

Acute oral toxicity	IV	Cited	EPA Reg. No. 62719-425
Acute dermal toxicity	IV	Cited	EPA Reg. No. 62719-425
Acute inhalation toxicity	IV	Cited	EPA Reg. No. 62719-425
Primary eye irritation	IV	Cited	EPA Reg. No. 62719-425
Primary skin irritation	IV	Cited	EPA Reg. No. 62719-425
Dermal sensitization	Negative	Cited	EPA Reg. No. 62719-425

3. Based on the toxicity profile above, the precautionary and first aid statements for this product are optional as long as the Signal Word **CAUTION** appears on the label.

4. For the purposes of this action, TRB has made no determination as to the adequacy of the acute toxicological data base or the precautionary statements for the technical product. In addition, for the purposes of registration, the CSF for the proposed product has to be reviewed and accepted by the TRB Chemistry Team.

TRANSMISSION VERIFICATION REPORT

TIME : 04/30/2007 01:36
 NAME : OPP IIAB
 FAX : 7033050599
 TEL : 7033050599
 SER.# : BROL4J146697

DATE, TIME
 FAX NO./NAME
 DURATION
 PAGE(S)
 RESULT
 MODE

04/30 01:30
 912538535516
 00:06:20
 22
 OK
 STANDARD
 ECM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460
 Potomac Yard (South Building)
 2777 S. Crystal Drive,
 Arlington, VA

Fax Number (703) 605-0781

OFFICE OF Pesticide Programs, Herbicide Branch

FACSIMILE REQUEST/ COVER SHEET

Send FAX TO:

Name:

Ms Ann Tillman

OFF:

Pyxis Regulatory Consulting, Inc.

FAX Phone Number

253-853-5516

Office Phone Number

253-853-7369

FROM:

Name:

Eugene Wilson

Division/Branch:

Registration Div, Herbicide Br.

Office Phone Number:

703 305 6103

Office Room Number:

57326

Mail Code:

7505P

DATE: 05-01-07

TIME:

12:30 PM

NUMBER OF PAGES (WITH COVER SHEET):

22

Dear Ann: Re: 72167-LH. Dithionyl Technical

... ON

(1) Association with



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460
Potomac Yard (South Building)
2777 S. Crystal Drive,
Arlington, VA

Fax Number (703) 605-0781

OFFICE OF Pesticide Programs, Herbicide Branch

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Eugene Wilson

Division/Branch:

Registration Div., Herbicide Br.

Office Phone Number:

703 305 6103

Office Room Number:

57326

Mail Code:

7505P

DATE:

05-01-07

TIME:

12:30 PM

NUMBER OF PAGES (WITH COVER SHEET):

22

Dear Ann: Re: 72167-LH. Dithionyl Technical
for Nativ Ag. Th. LHC. Please revised (1) Application with
a signed one - This is not a me too. (2) Correct CSF - Not
Manufactured in U.S.A. Box 6, (3) Based on review of PC -
submit required data etc. to 158.153^(a) and 158.167^(a)
on impurities in this product. See Attached PC Rev. 04-17-07
Please call if there are questions.
Re these comments.
Eugene M. Wilson
Risk Manager (23)
Response is due on May 6, 2007
PRTA date is May 23, 2007, Please consider withdrawal
or request extension to respond to data requirement.
Update with Certification with Respect to Citation of Data. Etk form 8570-34
and letters to all data submitters on EPA list. Resubmit labeling with corrections.

BARCODE: D334268; **Reg. No. :** 72167-LL **PRODUCT:** Dithiopyr Technical

FEE

DATE: 16 / APR/ 2007

SUBJECT: FEE. Product Chemistry Review on Dithiopyr Technical

FROM: Shyam B. Mathur, Ph.D
Product Chemistry Team Leader
Technical Review Branch/RD (7505P)

S. Mathur
4/17/07

TO: Eugene Wilson / Joanne Miller, RM 23
Herbicide Branch / RD (7505P)

DP BARCODE: D334268
DECISION No.: 371880
EPA REG. No.: 72167-LL
PRODUCT: Dithiopyr Technical
PCC: 128994
REGISTRANT: Nations Ag II, LLC
USE: Herbicide

INTRODUCTION:

The Pyxis Regulatory Consulting, Inc., on behalf of the registrant (Nations Ag II, LLC) has submitted the product chemistry data to support the registration of dithiopyr technical produced at Max (Rudong) Chemicals Company located at Jiangsu Province in PR of China. The product chemistry data corresponding to 830 series subgroup A and Subgroup B have been submitted under MRID Nos. 469748-01 thru 469748-03. The registrant has also submitted a CSF for basic formulation (10-27-06) and the product label. The registrant has claimed that the proposed dithiopyr TGA/MUP (File Symbol No. 72167-LL) is substantially similar to the registered product with Reg. No. 62719-425. The registrant has opted to use cite-all method of support. TRB has been asked to evaluate the product chemistry data submitted for the proposed MUP and determine its similarity to the registered product.

SUMMARY OF FINDINGS:

1. The registrant has submitted a Confidential Statement of Formula for basic formulation (10-27-06) for the dithiopyr TGA/MUP. The average purity of the technical/MUP is 97.0%, as determined by the five batch analysis. The proposed certified limits for the AI are based on the standard certified limits as set forth in 40CFR§158.175(b)(2), where as the certified limits for the impurities are based on the five batch analysis. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) satisfy the data requirements of 40CFR§158.155 and 158.175 respectively [MRID No. 469748-01].

2. The product chemistry data submitted corresponding to guideline reference 830.1600 (description of material used to produce the product) satisfy the data requirements of 40CFR§ 158.160 [MRID No. 469748-01].

BARCODE: D334268; **Reg. No. :** 72167-LL **PRODUCT:** Dithiopyr Technical

3. The product chemistry data submitted corresponding to guideline reference 830.1620 (description of production process) satisfy the data requirements for 40CFR§158.162. The dithiopyr Technical was manufactured in four step integrated process in China. All reactions were carried out in a glass-lined or enamel lined or stainless steel reactions vessel in a batch process. The details of the production process have been provided which included the amounts of each starting material used in the process, description of the equipment used, the reaction conditions (temperature, pH, etc.) and the yields of the final product and the steps taken to control the quality of the product [MRID No. 469748-01].

4. The product chemistry data submitted corresponding to guideline reference 830.1670 (discussion on the formation of impurities) satisfy the data requirements for 40CFR§158.167. During the production of dithiopyr technical (involving four steps), the registrant discussed and reported the formation of [REDACTED] impurities present at the levels of > 0.1%. The discussion has been provided on theoretical possible impurities and the impurities which are present at levels of < 0.1%. No impurity of toxicological concern associated with the TGA/MUP was reported during the synthesis [MRID No. 469748-01].

5. The data submitted corresponding the guideline reference 830.1700 (preliminary analysis) satisfy the data requirements of 40CFR§158.170. The study was conducted under GLP requirements in compliance with 40CFR§160. Five representative batches of the dithiopyr TGA/MUP produced in China were analyzed for percent active ingredient and the impurities by Product Safety Laboratory, NJ. The active ingredient & the impurity contents were determined by HPLC-UV (254 nm) with external standard method. The analytical method was validated for accuracy, linearity, and precision [MRID No. 469748-02].

6. The data submitted corresponding the guideline reference 830.1800 (enforcement analytical method) satisfy the data requirements of 40CFR§158.180. The purity of the AI in the TGA was determined by HPLC-UV (254 nm) external standard method. The consultant submitted by e-mail (dated 04-17-07, Ann Tillman), the enforcement analytical method (830.1800). The report was a non-confidential and as addendum to MRID No. 469748-02). The method was validated for precision, accuracy and linearity, LOQ and LOD [MRID No. 469748-02].

7. The data submitted corresponding to guidelines 830 Series Subgroup B (physical-chemical properties) satisfy the data requirements of 40CFR§158.190, except for 830.6313 (stability metal & metal ions), 830.6314 (oxidation/reduction), 830.6315 (flammability), 830.6316 (explosibility), one year storage stability (830.6317), corrosion characteristics (830.6320) studies [MRID No. 469748-03].

8. The registrant has requested (via e-mail dated 04-17-06 of Ann Tillman) waivers for the following guidelines:

- ☐ 830.6313 (stability to metal& metal ions)-stating that the dithiopyr technical does not come in contact during storage or production with any metal. The registrant is willing to propose a label restriction preventing formulation of end-use products in metal and metal ions containers.
- ☐ 830.6314 (oxidation/reduction)-Dithiopyr technical does not contain any oxidizers and reducing agents.
- ☐ 830.6315 (flammability)
- ☐ 830.6316 (explosibility)

10. Nations AG II will conduct one year storage stability (830.6317) and corrosion characteristics (830.6320) studies and requested a conditional registration be granted on the submission of these data (e-mail dated 04-17 of Ann Tillman).

BARCODE: D334268; **Reg. No. :** 72167-LL **PRODUCT:** Dithiopyr Technical

CONCLUSIONS:

The TRB has reviewed the product chemistry data submitted for dithiopyr TGAI / MUP and has concluded that:

1. All the product chemistry data submitted corresponding to 830 Series Subgroup A are acceptable.
2. The CSF for basic formulation (dated 10-27-06) is acceptable.
3. The data submitted corresponding to the 830 Series Subgroup B (physical-chemical properties) are acceptable except for, except for 830.6317 (one year storage stability), and 830.6320 (corrosion characteristics).
4. The registrant must generate studies corresponding to guidelines 830.6317(one year storage stability) and 830.6320 (corrosion characteristics). The observations must be made at 0, 3, 6, 9, & 12 months intervals. The results must be submitted to the Agency along with an electronic format also.
5. Based on the justifications provided, the Agency has no objection in granting waivers corresponding to guidelines: 830.6313 (metal& metal ions), 830.6314 (oxidation/reduction), 830.6315 (flammability), 830.6316 (explosibility), 830.6321 (dielectric breakdown voltage), 830.7100 (viscosity), 830.7220 (boiling point).
6. The proposed dithiopyr TGAI/MUP (File symbol No. 72167-LL) was determined not to be substantially similar to the registered product with Reg. No. 62719-425 (basic formulation, dated 7-16-99) from the product chemistry point of view. The impurity profile for the proposed MUP/TGAI and registered MUP/TGAI is significantly different [REDACTED], no common impurity). While the lack of the impurities is more environmentally favorable it may also affect the toxicity of the product. The nominal concentration of registered dithiopyr TGAI/MUP in the basic formulation (7-16-99) is 91.00%, whereas, the product label claim from the proposed product is 97.0%.

Note to PM: The Data Matrix (dated 10-27-06) submitted with this data package is incorrect with respect to 830 Series subgroup B (physical-chemical characteristics) data. The registrant should correct the data matrix. ✓

BARCODE: D334268; **Reg. No. :** 72167-LL **PRODUCT:** Dithiopyr Technical

830.1550. Product Identity & Composition: (MRID No. 469748-01)

Common Name: Dithiopyr technical

Chemical name (CAS): S, S'-dimethyl 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-3, 5-pyridinedicarbothioate.

IUPAC name: S, S'-dimethyl 2-difluoromethyl-4-isobutyl-6-trifluoromethylpyridine-3, 5-dicarbothioate.

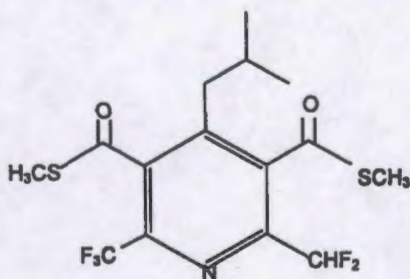
CAS No.: 97786-45-8

PC Code No.: 128994

Empirical formula: $C_{15}H_{16}F_5NO_2S_2$

Molecular Weight: 401.40

Structural formula



Dithiopyr

BARCODE: D334268; Reg. No. : 72167-LL PRODUCT: Dithiopyr Technical

Table 1. Manufacturing and Impurity Data for Dithiopyr TGAI/MUP				
GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and composition	Basic CSF (10-27-06)	A	The NC of AI (97%) is supported by 5 batch analysis & agrees with the label claim NC (97%). [REDACTED] impurities ($\geq 0.1\%$) are listed on the CSF.
830.1600	Description of materials used to produce the product	469748-01	A	The description & composition for all the starting materials used to produce the dithiopyr technical/mup have been provided by the registrant
830.1620	Description of production process	469748-01	A	The AI was produced in four stage integrated batch process followed by the purification step by crystallization. The production process has been described in full details. The reaction conditions, amounts of chemicals in each step, duration of time, and the yields in each step have been provided. The QA steps involved in each step have been described.
830.1670	Discussion of formation of impurities	469748-01	A	The registrant has provided the complete mechanisms of formation, quantification and identification of all the impurities present at the levels of $\geq 0.1\%$. [REDACTED] impurities have been listed on the CSF at levels of $\geq 0.1\%$. No impurity of tox concern was reported.
830.1700	Preliminary analysis	469748-02	A	Five representative batches of the dithiopyr tgai/mup were analyzed for percent active ingredient and the impurities. The purity of the AI in the TGAI was determined by HPLC-UV (254 nm) with external standard method. The impurities were identified & quantified also by HPLC-UV (254nm) and confirmed by LCMS. The five batch analysis supported the CSF for basic formulation.
830.1750	Certified limits	469748-01	A	The proposed certified limits for the AI are based on the standard certified limit table. Whereas proposed certified limits for the impurities are based on five batch analysis results.
830.1800	Enforcement analytical method	469748-02 (addendum by e-mail)	A	The HPLC-UV (254 nm) method was used for the determination of the AI content in the TGAI/MUP. The method was validated for precision, linearity, accuracy, LOD, & LOQ. The data submitted by e-mail as an addendum to the MRID No. 469748-02.
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)				

BARCODE: D334268; Reg. No. : 72167-LL PRODUCT: Dithiopyr Technical

830 Series Subgroup B (Physical-Chemical Properties)

Table 2: Physical and Chemical Properties of : Dithiopyr TGA/MUP				
GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	Color	469748-03	A	Tan
830.6303	Physical state	" " "	A	Powder
830.6304	Odor	" " "	A	Characteristics of sulfur containing compounds
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	" " "	A	Waiver requested for metal & metal ions is acceptable (with label warning, submitted by e-mail 04-17-06). Stable for 14 days at 54°C.
830.6314	Oxidation/reduction: chemical incompatibility	e-mail 04-17-07	W	Waiver request accepted
830.6315	Flammability	" " "	W	Waiver request accepted
830.6316	Explosibility	" " "	W	Waiver request
830.6317	Storage stability	e-mail (04-17-07)	G	Nations agreed to conduct study
830.6319	Miscibility	NA		
830.6320	Corrosion characteristics	e-mail (04-17-07)	G	Nations agreed to conduct study
830.7000	pH	469748-03	A	5.66 at 20°C
830.7050	UV/Visible absorption	" " "	A	See Note 1
830.7100	Viscosity	NA		
830.7200	Melting point	469748-03	A	65°C
830.7220	Boiling point	NA		
830.7300	Density Tap	469748-03	A	0.593 ± 0.005 g/ml at 20°C
	Pour		A	0.491 ± 0.003 g/ml
830.7370	Dissociation constants in water (DC)	Data matrix	A	Cite-all
830.7550	Partition coefficient	Data matrix	A	Cite-all
830.7840	Water solubility:	Data matrix	A	Cite-all
830.7950	Vapor pressure	Data matrix	A	Cite-all

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BARCODE: D334268; Reg. No. : 72167-LL PRODUCT: Dithiopyr Technical

830.7950. UV/VIS: (MRID No. 468748-03)

	Neutral	Acidic	Alkaline
Wavelength (nm)	240.8	243.5	221.0
ϵ Value calculated	9393.7	9581.6	13048.7

830.1800. Enforcement of analytical method: (MRID No. 469748-02; addendum data by e-mail on 04-17-07 by Ann Tillman)

The following information is directly taken from the additional data submitted by e-mail (4-17-07, Ann Tillman) without any modifications for the guideline 830.1800.

OPPTS GUIDELINE NO. 830.1800: ANALYTICAL METHODS TO VERIFY CERTIFIED LIMITS

Dithiopyr Technical may be analyzed by high performance liquid chromatography (HPLC) using the method presented below.

Instrument:
System: Thermo Surveyor
Detector: Hitachi UV Detector L-4000 or equivalent;
Pump: Hitachi L-6000 or equivalent;
Integrator: Hitachi D-2500 or equivalent;
Autosampler: Hitachi AS-7200 or equivalent;
Column: Zorbax Eclipse XDB-C8, 4.6 x 150 mm, 5 μ , or equivalent;
Column temperature: 30°C
Wavelength: 254 nm
Mobile Phase: 0.5% acetic acid in water:acetonitrile, 35:65
Flow rate: 1.0 ml/min
Injection volume: 5 μ l
Retention time: about 8 min.
Run time: 10 min.

Calibration: Standard Concentrations: Ranging from about 8 to 12 μ g/ml;
Correlation Coefficient: 0.99
Precision: Relative Standard Deviation: 0.28%

Standard Sample Preparation

An appropriate amount of dithiopyr standards is accurately weighed into a 100 mL volumetric flask and diluted to volume with acetonitrile then sonicated to mix well. A 1/100 dilution is performed using sample diluent (acidified water:acetonitrile, 35:65) and mixed well. Two standards at concentrations expected to bracket the test substances are prepared.

Test Sample Preparation

Approximately 0.1 g aliquots of the test substance are accurately weighed into 100 mL volumetric flasks and dissolved in and diluted to volume with acetonitrile then sonicated to mix well. Dilutions of 1/100 are performed using sample diluent (acidified water:acetonitrile, 35:65) and mixed well. Each sample is prepared in duplicate, and each preparation is injected in duplicate.

Analysis

At the beginning of the analysis, the instrument is equilibrated until a stable, consistent baseline is obtained. The standards and samples are injected at consistent time intervals in order to maintain a steady baseline. A solvent blank and standards are run in duplicate. After four sample injections, standard samples are run to confirm system stability and calibration.

Calculations

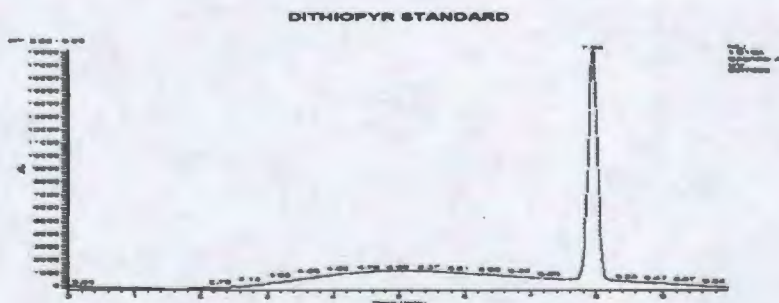
The concentration of the amount of dithiopyr present in a sample is determined using the equations below:

$$\% \text{ Assay} = \frac{\text{Sample peak area/Average response of the standard}}{\text{Sample concentration } (\mu\text{g/mL})} \times \text{Purity of standard}$$

Where "Average response of the standard" = average [standard peak area/standard concentration in μ g/mL]

Validation data for this analytical method can be found in MRID 469748-02.

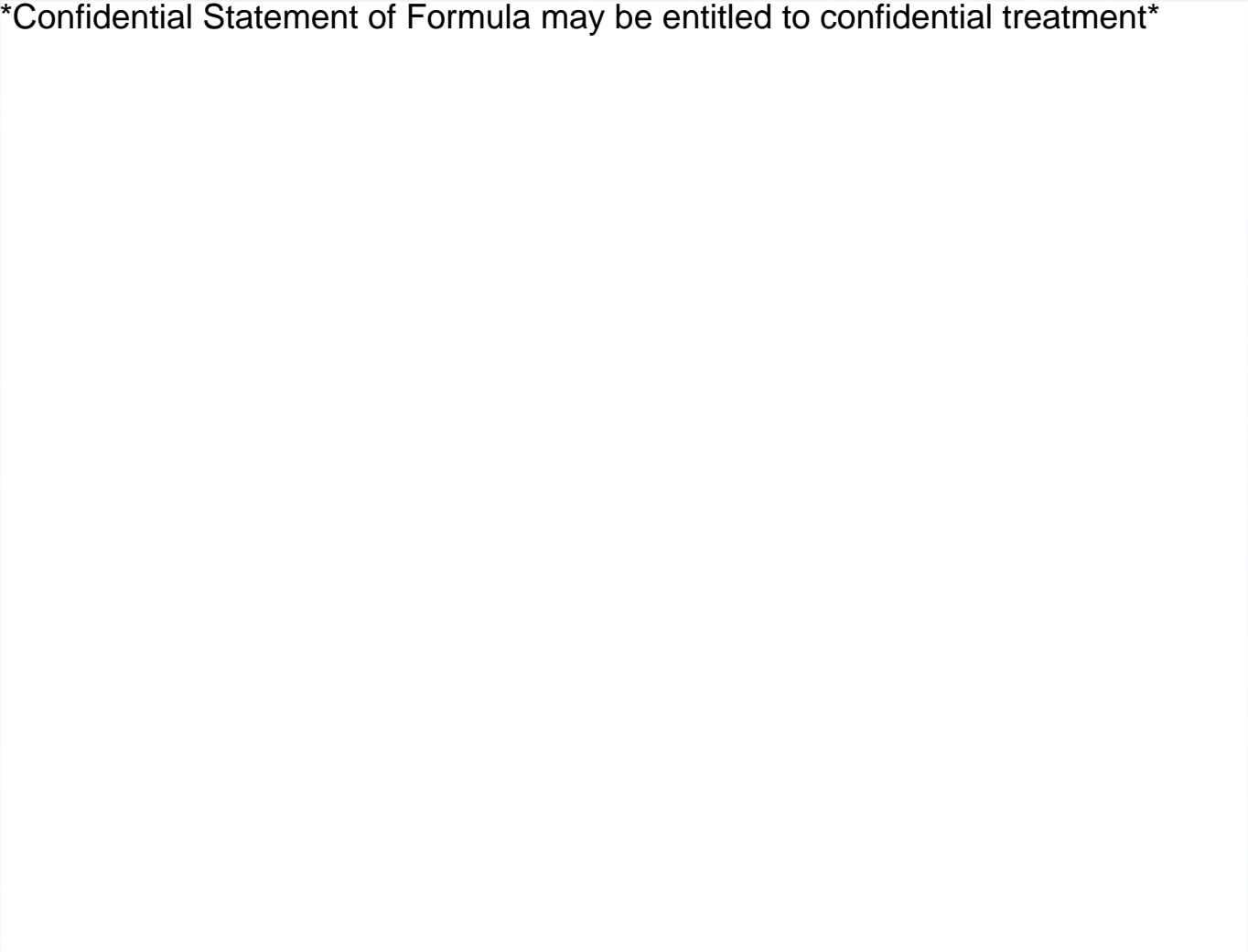
A sample chromatogram for dithiopyr analytical standard is presented below.



BARCODE: D334268; **Reg. No. :** 72167-LL **PRODUCT:** Dithiopyr Technical

CONFIDENTIAL APPENDIX

Confidential Statement of Formula may be entitled to confidential treatment





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 6, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT
Or Pay On-Line at www.Pay.Gov (See Below for Details)

OPP Decision Number: D-371880
EPA File Symbol or Registration Number: 72167-LL
Product Name: DITHIOPYR TECHNICAL
EPA Receipt Date: 03-Nov-2006
EPA Company Number: 72167
Company Name: NATIONS AG II, LLC

Ann Tillman
NATIONS AG II, LLC
911 WESTERN AVENUE, SUITE 206
SEATTLE, WA 98104-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R31

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT
CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

Please remit payment in the amount of: \$ 4,200 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit www.pay.gov. From the pay.gov home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee

Ombudsman at (703) 305-6249.

Sincerely,

Teresa Downs

Front End Processing Staff

Information Technology & Resources Management Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 7, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NATIONS AG II, LLC
911 WESTERN AVENUE, SUITE 206
SEATTLE, WA 98104-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 03-NOV-06. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 30, 2006

OVERNIGHT DELIVERY

Joanne Miller (PM 23)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Nations Ag II, LLC. – Dithiopyr Technical (EPA Reg. No. 72167-)
Application for New Pesticide Registration

Dear Ms. Miller,

On behalf of Nations Ag II, LLC, we are submitting an application for registration of Dithiopyr Technical, a technical product containing dithiopyr as the active ingredient. In support of this application, we submit the following documents:

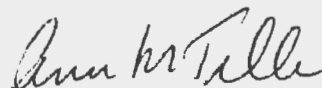
1. Application for a New Pesticide Registration (EPA Form 8570-1)
2. Confidential Statement of Formula (EPA Form 8570-4) dated Oct. 27, 2006
3. Five (5) Copies of the Proposed Labeling
4. Agency Internal Use Copy of the Data Matrix dated Oct. 27, 2006
5. Public File Copy of the Data Matrix dated Oct. 27, 2006
6. Copies of notice of intent to apply sent to companies identified on the Data Submitter's List
7. Letter of Authorization
8. Product Specific Data:

46974801	Volume 1	830.1550, 830.1600, 830.1620, 830.1670, 830.1750	Tillman, A.M. Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, and Certified Limits for Dithiopyr Technical. <i>Contains Confidential Business Information</i>
46974802	Volume 2	830.1700, 830.1800	Sheehy, J. Dithiopyr Technical – Preliminary Analysis. <i>Contains Confidential Business Information</i>
46974803	Volume 3	830.6302, 830.6303, 830.6304, 830.6313, 830.7000, 830.7050, 830.7300	Wo. C. Dithiopyr Technical – Physical and Chemical Characteristics

We would like to note that at this time, Nations Ag II, LLC is not submitting the Certification with Respect to Citation of Data, but *will be using the cite-all method of support*. As per EPA's interpretations of 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), Nations Ag II, LLC submitted notices of intent to apply to all companies on the September 30, 2006 Data Submitter's List. Nations Ag II, LLC is withholding the respective offer(s)-to-pay (and corresponding Certification with Respect to Citation of Data) until after EPA has determined that Nations Ag II, LLC's proposed product is considered substantially similar to the currently registered product and EPA has reviewed and agreed to the proposed data matrix. Nations Ag II, LLC understands that withholding the submission of the Certification with Respect to Citation of Data until prior to the approval of the registration will not delay processing of the application.

We trust you will find this application complete. However, please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures

PYXIS REGULATORY CONSULTING, INC.

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Volume 2	830.1700, 830.1800	Sheehy, J. Dithiopyr Technical – Preliminary Analysis. Contains Confidential Business Information
Volume 3	830.6302, 830.6303, 830.6304, 830.6313, 830.7000, 830.7050, 830.7300	Wo. C. Dithiopyr Technical – Physical and Chemical Characteristics

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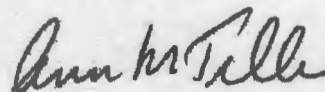
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J. Miller
Oct. 30, 2006
Page 2 of 2

We would like to note that at this time, Nations Ag II, LLC is not submitting the Certification with Respect to Citation of Data, but will be using the cite-all method of support. As per EPA's interpretations of 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), Nations Ag II, LLC submitted notices of intent to apply to all companies on the September 30, 2006 Data Submitter's List. Nations Ag II, LLC is withholding the respective offer(s)-to-pay (and corresponding Certification with Respect to Citation of Data) until after EPA has determined that Nations Ag II, LLC's proposed product is considered substantially similar to the currently registered product and EPA has reviewed and agreed to the proposed data matrix. Nations Ag II, LLC understands that withholding the submission of the Certification with Respect to Citation of Data until prior to the approval of the registration will not delay processing of the application.

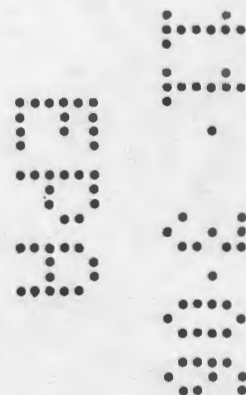
We trust you will find this application complete. However, please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures





<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72167-LL	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Nations Ag II, LLC/Dithiopyr Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Nations Ag II, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

☐ Amendment - Explain below.
 ☐ Final printed labels in response to Agency letter dated _____

☒ Resubmission in response to Agency letter dated _____
 ☐ "Me Too" Application.

☐ Notification - Explain below.
 ☒ Other - Explain below.

Submission of amended report per J. Miller email dated 4/30/07

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container		Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	
Certification must be submitted				2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information		4. Size(s) Retail Container		5. Location of Label Directions	
<input type="checkbox"/> Label <input type="checkbox"/> Container				<input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ann Tillman	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature	3. Title Agent	187
4. Typed Name Ann Tillman	5. Date	

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

May 1, 2007

OVERNIGHT DELIVERY

Joanne Miller (PM 23)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Nations Ag II, LLC. – Dithiopyr Technical (EPA Reg. No. 72167-LL)
Submission of Amended Report to Comply with PR86-5

Dear Ms. Miller,

Enclosed please find a copy of the revised report to comply with PR86-5. The report was part of the submission sent with my letter dated April 17, 2007 (MRID 471096-00). The following documents are enclosed:

1. Application for a New Pesticide Registration (EPA Form 8570-1)
2. Product Specific Data:

47120501

Volume 1	830.1800	Tillman, A. M. Addendum to MRID 469748-02. Dithiopyr Technical – Preliminary Analysis.
----------	----------	---

Please feel free to contact me (ann@pyxisrc.com; 253-853-7369) if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures

PYXIS REGULATORY CONSULTING, INC.

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Gig Harbor, WA 98332

Phone: 253-853-7369
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Volume 1	830.1800	Tillman, A. M. Addendum to MRID 469748-02. Dithiopyr Technical – Preliminary Analysis.
----------	----------	---

Please feel free to contact me (ann@pyxisrc.com; 253-853-7369) if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures

MEMORANDUM

DATE: 5 / 7 / 07

TO: PM 23 (MILLER), Regulatory Manager

FROM: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission
☐ partially accepted submission
☐ rejected submission

VOLUME 1 OF 2

STUDY TITLE

Addendum to MRID 469748-02
Dithiopyr Technical – Preliminary Analysis

DATA REQUIREMENTS

40 CFR 158
OPPTS PRODUCT PROPERTIES TEST GUIDELINES
830.1800

AUTHOR

Ann M. Tillman

PERFORMING LABORATORY

N/A – No Analysis Performed

STUDY NUMBER

19645

SPONSOR

Nations Ag II, LLC
911 Western Ave. Suite 206
Seattle, WA 98104

DATE

April 17, 2007

Page 1 of 7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 3, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NATIONS AG II, LLC
4515 FALLS OF NEUSE ROAD, SUITE 300
RALEIGH, NC 27609-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 02-MAY-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Dithiopyr Technical

ACTIVE INGREDIENT:

3,5-Pyridinedicarbothioic acid, 2-(difluoromethyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-S,S-dimethyl ester 97.0%

OTHER INGREDIENTS 3.0%

TOTAL 100.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

PRECAUTIONARY STATEMENTS

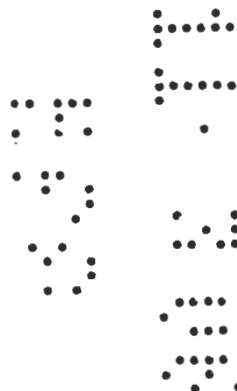
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

In case of an emergency involving this product call: 1-800-308-5391

EPA Reg. No 72167-
EPA Est. No: xxxx

Net Weight: XXXX

Nations Ag II, LLC
911 Western Ave., Suite 206
Seattle, WA 98104



ENVIRONMENTAL HAZARDS

Toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, ocean or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NDPES) permit and the permitting of authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For manufacturing and formulation into herbicides only.

For use on established ornamental turf and lawn grasses (including golf course fairways, roughs, and tee boxes), sod farms, non-cropland and industrial sites, established landscape ornamentals, field and container ornamentals.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage, disposal, or cleaning or equipment.

Pesticide Storage: Store in original container.

Pesticide Disposal: Pesticide wastes are toxic. If these wastes cannot be disposed of by use of according to label instructions, they must be disposed of according to federal, state, and local procedures. Contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Triple rinse (or equivalent) the drum. Then, offer for recycling or reconditioning, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Seller warrants that this product conforms within its specifications and is reasonably fit for the purposes stated on the label when used in accordance with its directions under normal conditions of use. Buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty of fitness or merchantability and no agent or reseller is authorized to do so except by Seller in writing with a specific reference to this warranty. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which claim is made.



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72167- LL	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Nations Ag II, LLC / Dithiopyr Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Nations Ag II, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 62719-425/707-244 Product Name Dithiopyr Technical	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This application falls under Category R31 (86: New product, non-fast track) because it is an application for registration (using the cite-all method of support) for a new technical registration substantially similar to a currently registered product. The fee due is \$4200 and the decision timeline is 6 months. Please email or fax the fee for service invoice to: Fees@PyxisRC.com or 253-853-5516.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
If "Yes" Unit Packaging wgt.		No. per container	If "Yes" Package wgt.	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) lined fiber drum	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 25 kg		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Ann Tillman	Title Agent	Telephone No. (Include Area Code) (253) 853-7389	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Agent		
4. Typed Name Ann Tillman	5. Date ?		

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 30, 2006

OVERNIGHT DELIVERY

Joanne Miller (PM 23)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Nations Ag II, LLC. – Dithiopyr Technical (EPA Reg. No. 72167-)
Application for New Pesticide Registration

Dear Ms. Miller,

On behalf of Nations Ag II, LLC, we are submitting an application for registration of Dithiopyr Technical, a technical product containing dithiopyr as the active ingredient. In support of this application, we submit the following documents:

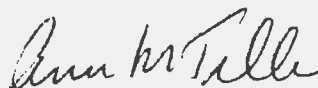
1. Application for a New Pesticide Registration (EPA Form 8570-1)
2. Confidential Statement of Formula (EPA Form 8570-4) dated Oct. 27, 2006
3. Five (5) Copies of the Proposed Labeling
4. Agency Internal Use Copy of the Data Matrix dated Oct. 27, 2006
5. Public File Copy of the Data Matrix dated Oct. 27, 2006
6. Copies of notice of intent to apply sent to companies identified on the Data Submitter's List
7. Letter of Authorization
8. Product Specific Data:

46974801	Volume 1	830.1550, 830.1600, 830.1620, 830.1670, 830.1750	Tillman, A.M. Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, and Certified Limits for Dithiopyr Technical. <i>Contains Confidential Business Information</i>
46974802	Volume 2	830.1700, 830.1800	Sheehy, J. Dithiopyr Technical – Preliminary Analysis. <i>Contains Confidential Business Information</i>
46974803	Volume 3	830.6302, 830.6303, 830.6304, 830.6313, 830.7000, 830.7050, 830.7300	Wo. C. Dithiopyr Technical – Physical and Chemical Characteristics

We would like to note that at this time, Nations Ag II, LLC is not submitting the Certification with Respect to Citation of Data, but *will be using the cite-all method of support*. As per EPA's interpretations of 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), Nations Ag II, LLC submitted notices of intent to apply to all companies on the September 30, 2006 Data Submitter's List. Nations Ag II, LLC is withholding the respective offer(s)-to-pay (and corresponding Certification with Respect to Citation of Data) until after EPA has determined that Nations Ag II, LLC's proposed product is considered substantially similar to the currently registered product and EPA has reviewed and agreed to the proposed data matrix. Nations Ag II, LLC understands that withholding the submission of the Certification with Respect to Citation of Data until prior to the approval of the registration will not delay processing of the application.

We trust you will find this application complete. However, please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date October 27, 2006

EPA Reg No./File Symbol 72167-

Page /of 5

Applicant's/Registrant's Name & Address

Nations Ag II, LLC
911 Western Avenue, Suite 206
Seattle, WA 98104

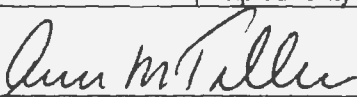
Product

Dithiopyr Technical

Ingredient Dithiopyr

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements					
830.1550	Product Identity and Composition	Volume 1	Nations Ag II, LLC	OWN	
830.1600	Description of Materials Used to Produce the Product	Volume 1	Nations Ag II, LLC	OWN	
830.1620	Description of Production Process	Volume 1	Nations Ag II, LLC	OWN	
830.1650	Description of Formulation Process				Not required ¹
830.1670	Discussion of Formation of Impurities	Volume 1	Nations Ag II, LLC	OWN	
830.1700	Preliminary Analysis	Volume 2	Nations Ag II, LLC	OWN	
830.1750	Certified Limits	Volume 1	Nations Ag II, LLC	OWN	
830.1800	Enforcement Analytical Method	Volume 2	Nations Ag II, LLC	OWN	
830.6302	Color	Volume 3	Nations Ag II, LLC	OWN	
830.6303	Physical State	Volume 3	Nations Ag II, LLC	OWN	
830.6304	Odor	Volume 3	Nations Ag II, LLC	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	Volume 3	Nations Ag II, LLC	OWN	Waive
830.6314	Oxidation/Reduction: Chemical Incompatibility				Not required ²
830.6315	Flammability				Not required ²
830.6316	Explosibility				Not required ²

Signature



Name and Title

Ann M. Tillman, Consultant

Date

10/27/06

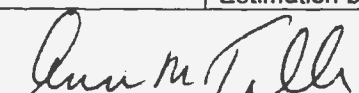
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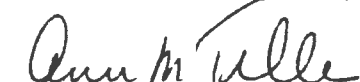
Date October 27, 2006			EPA Reg No./File Symbol 72167-		Page 2 of 5
Applicant's/Registrant's Name & Address Nations Ag II, LLC 911 Western Avenue, Suite 206 Seattle, WA 98104			Product Dithiopyr Technical		
Ingredient Dithiopyr					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability				Not required ²
830.6319	Miscibility				Not required ²
830.6320	Corrosion Characteristics				Not required ²
830.6321	Dielectric Breakdown Voltage				Not required ²
830.7000	pH	Volume 3	Nations Ag II, LLC	OWN	
830.7050	UV/Visible Absorption	Volume 3	Nations Ag II, LLC	OWN	
830.7100	Viscosity				Not required ²
830.7200	Melting Point/Melting Range	Volume 3	Nations Ag II, LLC	OWN	
830.7220	Boiling Point/Boiling Range				Not required ³
830.7300	Density/Relative Density/Bulk Density	Volume 3	Nations Ag II, LLC	OWN	
830.7370	Dissociation Constants in Water	Cite-All		PAY	
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	Volume 3	Nations Ag II, LLC	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method	Cite-All		PAY	See 830.7560
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7560
Signature 			Name and Title Ann M. Tillman, Consultant		Date 10/27/06

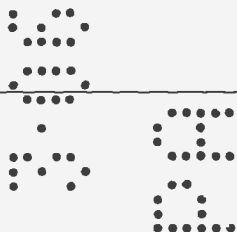
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DATA MATRIX

Date October 27, 2006			EPA Reg No./File Symbol 72167-		Page 3 of 5
Applicant's/Registrant's Name & Address Nations Ag II, LLC 911 Western Avenue, Suite 206 Seattle, WA 98104			Product Dithiopyr Technical		
Ingredient Dithiopyr					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	Cite-All		PAY	
830.7860	Water Solubility, Generator Column Method				See 830.7840
830.7950	Vapor Pressure	Cite-All		PAY	
870.1100	Acute Oral Toxicity: Rat	Cite-All		PAY	
870.1200	Acute Dermal Toxicity: Rat	Cite-All		PAY	
870.1300	Acute Inhalation Toxicity: Rat	Cite-All		PAY	
870.2400	Primary Eye Irritation: Rabbit	Cite-All		PAY	
870.2500	Primary Dermal Irritation	Cite-All		PAY	
870.2600	Dermal Sensitization	Cite-All		PAY	
Signature 			Name and Title Ann M. Tillman, Consultant		Date 10/27/06



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date October 27, 2006		EPA Reg No./File Symbol 72167-		Page 4 of 5	
Applicant's/Registrant's Name & Address Nations Ag II, LLC 911 Western Avenue, Suite 206 Seattle, WA 98104		Product Dithiopyr Technical			
Ingredient Dithiopyr					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Nations Ag II, LLC will make offers-to-pay to the following companies on the September 30, 2006 Data Submitters List for Dithiopyr.					
Dithiopyr Generic Data Requirements					
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Bayer Crop Science LP	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Lebanon Seaboard Corp.	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		PBI/Gordon Corp.	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Southern States Coop., Inc.	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Totalturf Consulting LLC	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		United Industries Corp.	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		The Andersons Lawn Fertilizer Division	PAY	
Signature <i>Ann M. Tillman</i>			Name and Title Ann M. Tillman, Consultant		Date 10/27/06

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date October 27, 2006

EPA Reg No./File Symbol 72167-

Page 5 of 5

Applicant's/Registrant's Name & Address

Nations Ag II, LLC
911 Western Avenue, Suite 206
Seattle, WA 98104

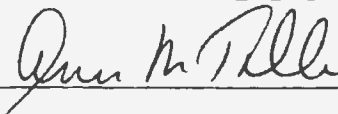
Product

Dithiopyr Technical

Ingredient Dithiopyr

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Chemisco	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Agrilience LLC	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Lesco Inc.	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Loveland Products	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Dow Agrosiences LLC	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Spray Drift Task Force	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Outdoor Residential Exposure Task Force, LLC	PAY	
Dithiopyr Generic Data Requirements	Cite-All utilized by Nations Ag II, LLC for Dithiopyr generic data requirements		Residential Exposure Joint Venture	PAY	

Signature



Name and Title

Ann M. Tillman, Consultant

Date

10/27/06

Endnotes for Data Matrix for Dithiopyr Technical

¹ **830.1650** - Per OPPTS 830.1000, these data are not required for the registration of a technical product. See 830.1620 for production process information.

² **830.6314, 830.6315, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, 830.7100** - Per OPPTS 830.1000, these data are not required for the registration of a technical product.

³ **830.7220** - Dithiopyr Technical is a solid at room temperature. Boiling point data are not required for solids.

843

904 11




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date October 27, 2006		EPA Reg No./File Symbol 72167-		Page / of 5	
Applicant's/Registrant's Name & Address Nations Ag II, LLC 911 Western Avenue, Suite 206 Seattle, WA 98104		Product Dithiopyr Technical			
Ingredient Dithiopyr					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements					
			Nations Ag II, LLC	OWN	
			Nations Ag II, LLC	OWN	
			Nations Ag II, LLC	OWN	
					Not required ¹
			Nations Ag II, LLC	OWN	
			Nations Ag II, LLC	OWN	
			Nations Ag II, LLC	OWN	
			Nations Ag II, LLC	OWN	
			Nations Ag II, LLC	OWN	
			Nations Ag II, LLC	OWN	
			Nations Ag II, LLC	OWN	
			Nations Ag II, LLC	OWN	Waive
					Not required ²
					Not required ²
		Not required ²			
Signature 			Name and Title Ann M. Tillman, Consultant		Date 10/27/06

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date October 27, 2006

EPA Reg No./File Symbol 72167-

Page 2 of 5

Applicant's/Registrant's Name & Address

Nations Ag II, LLC
911 Western Avenue, Suite 206
Seattle, WA 98104

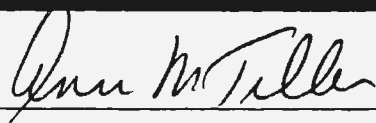
Product

Dithiopyr Technical

Ingredient Dithiopyr

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
					Not required ²
					Not required ²
					Not required ²
					Not required ²
			Nations Ag II, LLC	OWN	
			Nations Ag II, LLC	OWN	
					Not required ²
			Nations Ag II, LLC	OWN	
					Not required ³
			Nations Ag II, LLC	OWN	
				PAY	
			Nations Ag II, LLC	OWN	
				PAY	See 830.7560
					See 830.7560

Signature



Name and Title

Ann M. Tillman, Consultant

Date

10/27/06

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

11-3005

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

EPA

DATA MATRIX

Date October 27, 2006

EPA Reg No./File Symbol 72167-

Page 3 of 5

Applicant's/Registrant's Name & Address

Nations Ag II, LLC
911 Western Avenue, Suite 206
Seattle, WA 98104

Product

Dithiopyr Technical

Ingredient Dithiopyr

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
				PAY	
					See 830.7840
				PAY	
				PAY	
				PAY	
				PAY	
				PAY	

Signature

Ann M. Tillman

Name and Title

Ann M. Tillman, Consultant

Date

10/27/06



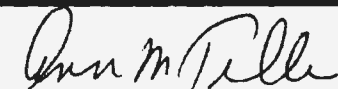
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date October 27, 2006		EPA Reg No./File Symbol 72167-		Page 4 of 5	
Applicant's/Registrant's Name & Address Nations Ag II, LLC 911 Western Avenue, Suite 206 Seattle, WA 98104		Product Dithiopyr Technical			
Ingredient Dithiopyr					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Nations Ag II, LLC will make offers-to-pay to the following companies on the September 30, 2006 Data Submitters List for Dithiopyr.					
Dithiopyr Generic Data Requirements					
			Bayer Crop Science LP	PAY	
			Lebanon Seaboard Corp.	PAY	
			PBI/Gordon Corp.	PAY	
			Southern States Coop., Inc.	PAY	
			Totalturf Consulting LLC	PAY	
			United Industries Corp.	PAY	
			The Andersons Lawn Fertilizer Division	PAY	
Signature 		Name and Title Ann M. Tillman, Consultant		Date 10/27/06	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date October 27, 2006

EPA Reg No./File Symbol 72167-

Page 5 of 5

Applicant's/Registrant's Name & Address

Nations Ag II, LLC
911 Western Avenue, Suite 206
Seattle, WA 98104

Product

Dithiopyr Technical

Ingredient Dithiopyr

Guideline Reference Number

Guideline Study Name

MRID Number

Submitter

Status

Note

Chemisco

PAY

Agrilience LLC

PAY

Lesco Inc.

PAY

Loveland Products

PAY

Dow Agrosiences LLC

PAY

Spray Drift Task Force

PAY

Outdoor Residential Exposure
Task Force, LLC

PAY

Residential Exposure Joint
Venture

PAY

Signature

Name and Title

Ann M. Tillman, Consultant

Date

10/27/06

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0212

Agriliance LLC
P.O. Box 64089
St. Paul, MN 55164

RE: Notice of Intent to Apply for Registration

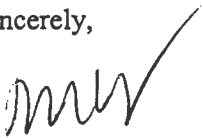
Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

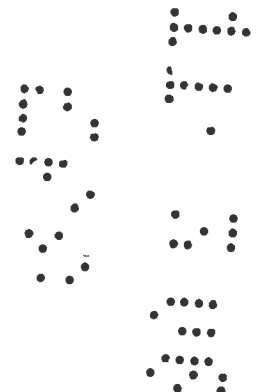
In EPA's September 30, 2006 Listing of Pesticide Data Submitters, your company is included as one of those who have data on file at the Agency for dithiopyr. As such, Nations Ag II, LLC is providing your company of its notice of intent to apply for registration. *This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B).* As directed by EPA, prior to EPA's approval of Nations Ag II, LLC's registration, Nations Ag II, LLC will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC



PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0199

The Andersons Lawn Fertilizer Division, Inc.
D/B/A Free Flow Fertilizer
P.O. Box 119
Maumee, OH

RE: Notice of Intent to Apply for Registration


Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

In EPA's September 30, 2006 Listing of Pesticide Data Submitters, your company is included as one of those who have data on file at the Agency for dithiopyr. As such, Nations Ag II, LLC is providing your company of its notice of intent to apply for registration. *This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B).* As directed by EPA, prior to EPA's approval of Nations Ag II, LLC's registration, Nations Ag II, LLC will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0137

Bayer CropScience LP
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

RE: Notice of Intent to Apply for Registration

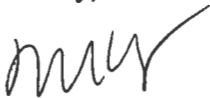
Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

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Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0205

Chemsico
Div. of United Industries Corp
P.O. Box 142642
St. Louis, MO 63114

RE: Notice of Intent to Apply for Registration

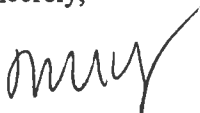
Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

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Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0175

Total Turf Consulting, Inc.
Agent for: Knox Fertilizer Company, Inc.
300 W. Fifth St. #411
Charlotte, NC 28202

RE: Notice of Intent to Apply for Registration

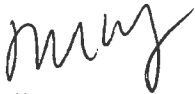
Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

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Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

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4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7006 0100 0004 4382 0144

Lebanon Seaboard Corporation
1600 East Cumberland St.
Lebanon, PA 17042

RE: Notice of Intent to Apply for Registration

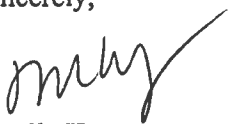
Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

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Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0229

Lesco, Inc.
1301 East 9th Street, Suite 1300
Cleveland, OH 44114

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

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Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0267

Outdoor Residential Exposure Task Force, LLC
c/o Beveridge and Diamond
1350 I Street, NW
Washington, DC 20005

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

In EPA's September 30, 2006 Listing of Pesticide Data Submitters, your company is included as one of those who have data on file at the Agency for dithiopyr. As such, Nations Ag II, LLC is providing your company of its notice of intent to apply for registration. *This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B).* As directed by EPA, prior to EPA's approval of Nations Ag II, LLC's registration, Nations Ag II, LLC will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0151

PBI/Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

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Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0168

Southern States Cooperative, Inc.
6606 West Broad Street
Richmond, VA 23230

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

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Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0182

United Industries Corp.
D/B/A Sylorr Plant Corp.
P.O. Box 142642
St. Louis, MO 63114

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

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Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

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4110 136th St. NW
Gig Harbor, WA 98332

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October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0236

Loveland Products, Inc.
P.O. Box 1286
Greeley, CO 80632

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

In EPA's September 30, 2006 Listing of Pesticide Data Submitters, your company is included as one of those who have data on file at the Agency for dithiopyr. As such, Nations Ag II, LLC is providing your company of its notice of intent to apply for registration. *This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B).* As directed by EPA, prior to EPA's approval of Nations Ag II, LLC's registration, Nations Ag II, LLC will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0243

Dow Agrosciences LLC
9330 Zionsville RD 308/2E225
Indianapolis, IN 46268

RE: Notice of Intent to Apply for Registration

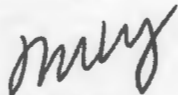
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Gig Harbor, WA 98332

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Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0274

Residential Exposure Joint Venture (REJV)
900 17th Street, NW
Suite 300
Washington, DC 20006

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

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Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

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4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 25, 2006

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7006 0100 0004 4382 0250

Spray Drift Task Force
c/o McKenna & Cuneo LLP
1900 K Street, NW
Washington, DC 20006

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Pursuant to 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), please let this letter serve as a notice of Nations Ag II, LLC intent to apply for registration of a technical product containing dithiopyr as the active ingredient. The proposed product name is "Dithiopyr Technical".

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Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Nations Ag II, LLC

Nations Ag II



May 11, 2006

Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

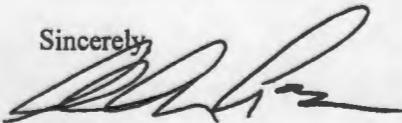
RE: Letter of Authorization

To Whom It May Concern:

Nations Ag II, LLC (EPA Company No. 72167) hereby appoints and authorizes Pyxis Regulatory Consulting, Inc. to act as Agent on behalf of Nations Ag II, LLC before the U.S. Environmental Protection Agency in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

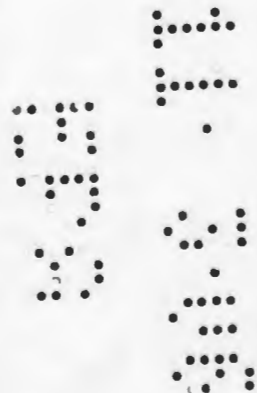
If you have any questions, please call me at 253-812-8603.
Thank you for your consideration.

Sincerely,



Allan Las
Chief, US Product Development Officer

cc: Pyxis Regulatory Consulting, Inc.



VOLUME 2 OF 2

STUDY TITLE

Waiver Request for Certain Data Requirements for Dithiopyr Technical

DATA REQUIREMENTS

40 CFR 158.150

OPPTS PRODUCT PROPERTIES TEST GUIDELINES

830.6313, 830.6314, 830.6315, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, 830.7100, 830.7220

AUTHOR

Ann M. Tillman

PERFORMING LABORATORY

Not Applicable

STUDY NUMBER

NA-200701

SPONSOR

Nations Ag II, LLC
911 Western Ave. Suite 206
Seattle, WA 98104

DATE

April 17, 2007

Page 1 of 7

VOLUME 1 OF 2

STUDY TITLE

Addendum to MRID 469748-02
Dithiopyr Technical – Preliminary Analysis

DATA REQUIREMENTS

40 CFR 158
OPPTS PRODUCT PROPERTIES TEST GUIDELINES
830.1800

AUTHOR

Ann M. Tillman

PERFORMING LABORATORY

N/A – No Analysis Performed

STUDY NUMBER

19645

SPONSOR

Nations Ag II, LLC
911 Western Ave. Suite 206
Seattle, WA 98104

DATE

April 17, 2007

Page 1 of 7

